

PRIVACY POLICY AND GDPR COMPLIANCE

God Help Me (GHM) — SaaS Automated Trading Strategy Software for Cryptocurrency Futures

Version: 3.0 **Effective date:** July 1, 2026 **Last updated:** July 1, 2026

1. INTRODUCTION

This Policy describes how **God Help Me** (“GHM”) collects, uses, stores, protects, and shares personal data of its users, in compliance with the **General Data Protection Regulation** (Regulation (EU) 2016/679 — GDPR), the **ePrivacy Directive** (2002/58/EC), and, subsidiarily, the **Brazilian General Data Protection Law** (Lei nº 13.709/2018 — LGPD).

This document applies specifically to users residing or located in the **European Union (EU)** and the **European Economic Area (EEA)**, supplementing the Terms of Use and the Subscription Agreement.

Core principles:

- GHM **does not collect sensitive data** (health, race, religion, affiliation, biometrics, sexual orientation, political opinions, etc.).
 - GHM **does not sell, rent, or transfer personal data** to third parties for marketing purposes.
 - GHM **does not have access to the user’s capital**. Operations are executed on the user’s own exchange account via their API credentials.
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2. DATA CONTROLLER AND DATA PROTECTION OFFICER (DPO)

Item	Information
Controller	God Help Me Operator
DPO e-mail	privacidade@ghm.trading
Support e-mail	suporte@ghm.trading
Response time	Up to 30 days (extendable by a further 60 days, as per Art. 12(3) GDPR)

3. PERSONAL DATA COLLECTED

GHM collects only data that is strictly necessary, respecting the principle of data minimisation (Art. 5(1)(c) GDPR).

Data	Category	Purpose
Telegram user_id and chat_id	Identification	Authentication and notification delivery
Telegram name/username	Identification	Communication personalisation
Exchange API key/secret	Access	Automated order execution
Subscription plan and settings	Contractual	Access control and support
Payment data (Mercado Pago)	Financial	Billing and payment confirmation
Trading operational data	Operational	Audit, support, and strategy improvement
Error and access logs	Technical	Diagnostics and security
Navigation data and cookies	Marketing	Campaign measurement (with consent only)

GHM does not collect: national identification numbers, full bank account data, sensitive data (Art. 9 GDPR), selfies, or documents.

4. COOKIES, PIXELS, AND TRACKING FOR PAID ADVERTISING

GHM uses tracking technologies on its landing page **exclusively with prior and explicit consent** of the user (Art. 6(1)(a) GDPR, ePrivacy Directive):

Technology	Purpose	Legal basis
Meta Pixel (Facebook/Instagram)	Meta Ads conversion measurement	Consent — Art. 6(1)(a)
Google Tag / Google Analytics	Google Ads conversion measurement	Consent — Art. 6(1)(a)
Strictly necessary cookies	Technical website functionality	Legitimate interest — Art. 6(1)(f)

Consent and cookie control

1. On the first visit to the website, the user is presented with a **cookie banner** with granular options (accept/reject by category).
2. Marketing/analytics cookies **are not activated** until the user gives explicit consent.
3. Consent may be **revoked at any time** through the website's cookie settings or by e-mail to privacidad@ghm.trading.
4. Refusal of marketing cookies **does not affect** access to the service.

5. LEGAL BASES FOR PROCESSING (GDPR — Art. 6)

Legal basis	Application
Art. 6(1)(b) — Contract performance	Payment, service provisioning, order execution, operational communications
Art. 6(1)(a) — Consent	Marketing cookies, promotional communications, newsletters
Art. 6(1)(f) — Legitimate interest	Security logs, fraud prevention, technical improvement, strictly necessary cookies
Art. 6(1)(c) — Legal obligation	Judicial or regulatory requests

GHM **does not process special categories of data** (Art. 9 GDPR) such as health, racial/ethnic origin, political opinions, religious beliefs, genetic or biometric data.

6. STORAGE AND SECURITY

- Data stored in infrastructure with restricted access and security controls.
 - API credentials stored with encryption in an isolated container per user.
 - Communication exclusively via TLS/HTTPS.
 - Logical data isolation per user.
 - Continuous monitoring and security alerts.
 - Encrypted backups with limited retention.
 - The operator does not use API keys for purposes beyond contracted automated execution.
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7. DATA SHARING

Data is shared only with:

- **Telegram** — message and notification delivery.
- **Mercado Pago** — payment processing.
- **User's chosen exchange** (Binance, Bybit, Bitget, Gate.io, OKX) — order execution via user-provided credentials.
- **LLM providers** (optional) — market context analysis, when the user configures their own API keys.
- **Meta Platforms** — conversion data (with consent only, in aggregated/anonymised form).
- **Google** — conversion data (with consent only, in aggregated/anonymised form).

GHM does not share identifiable personal data with third parties for advertising purposes.

8. INTERNATIONAL DATA TRANSFERS (EU/EEA → BRAZIL)

Data of EU/EEA users is processed on servers located in **Brazil**. To ensure adequate protection:

1. **Standard Contractual Clauses** (SCCs) as per European Commission decisions are applied.
2. **Supplementary technical and organisational measures** are implemented (encryption, access control, isolation).
3. Brazil has adequacy recognition by the European Commission (decision pending update); regardless of status, GHM applies SCCs as a safeguard.

The user acknowledges and consents to international data transfer by using the service.

9. DATA SUBJECT RIGHTS (Arts. 15-22 GDPR)

At any time, you have the right to:

1. **Access** your personal data (Art. 15).
2. **Rectification** of inaccurate or incomplete data (Art. 16).
3. **Erasure** ("right to be forgotten"), within legal limits (Art. 17).
4. **Restriction** of processing (Art. 18).
5. **Portability** of data in a structured format (Art. 20).
6. **Object** to processing based on legitimate interest (Art. 21).
7. **Not be subject** to solely automated decisions with significant effects (Art. 22).
8. **Withdraw consent** at any time, without affecting the lawfulness of prior processing (Art. 7(3)).

To exercise your rights, send an e-mail to **privacidade@ghm.trading** with your Telegram identifier and a description of the right you wish to exercise.

You also have the right to lodge a **complaint with the supervisory authority** (Data Protection Authority) of the EU country where you reside.

10. RETENTION AND DELETION

- Data is retained for the time necessary for service delivery, compliance with legal obligations, and dispute resolution.
 - Upon subscription termination, the user may request complete deletion.
 - API credentials are deleted immediately upon service termination.
 - Anonymised data may be retained for statistical purposes (Recital 26 GDPR).
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11. SECURITY INCIDENTS

In the event of a personal data breach:

1. The competent supervisory authority will be notified within **72 hours** (Art. 33 GDPR), where applicable.
 2. Affected data subjects will be informed when there is a high risk to their rights and freedoms (Art. 34 GDPR).
 3. The incident will be documented with containment and remediation measures.
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12. MINORS

GHM is intended exclusively for individuals **aged 18 or older** with full legal capacity. We do not intentionally collect data from minors. If we identify improper processing, the data will be deleted immediately.

13. CHANGES

This Policy may be updated to reflect legislative, regulatory, or operational changes. Material changes will be communicated at least **15 (fifteen) days in advance**.

14. CONTACT AND GOVERNING LAW

DPO / Privacy: privacidade@ghm.trading **Support:** suporte@ghm.trading

Governing law: Regulation (EU) 2016/679 (GDPR) as the primary standard for EU/EEA users. Subsidiarily, Brazilian Law nº 13.709/2018 (LGPD).

Jurisdiction: For EU users, consumer relations are governed by the law of the consumer's country of residence. For other matters, the courts of the District of São Paulo/SP, Brazil, have jurisdiction, without prejudice to complaints to the competent data protection authority.

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