

Last updated: 29 January 2026

Privacy Policy

42 Ltd ("42," "we," "us," or "our") is committed to safeguarding the privacy of individuals whose personal data we process, including our clients, prospective clients, visitors to our website, and counterparties in the financial markets. 42 is registered as a limited company in the Cayman Islands with its registered office at Athena Tower, 6th Floor, 71 Fort Street, P.O. Box 1569, George Town, Grand Cayman KY1-1110, KY. This Privacy Policy outlines how we collect, use, disclose, and protect your personal data in accordance with applicable **Cayman Islands laws**, including the **Data Protection Act (2021 Revision)** (as amended from time to time) (the "DPA").

By accessing our website, engaging with us, or using our services, you acknowledge and consent to the processing of your personal data as described in this Privacy Policy.

Personal data we collect

We may collect and process various categories of personal data, including but not limited to:

- **Identity Information:** Full name, date of birth, nationality, government-issued identification numbers (e.g., passport, driver's license).
- **Contact Information:** Email address, phone number, physical address.
- **Financial & Trading Information:** Investment history, trading activity, account details, financial assets, and income details.
- **Technical & Usage Data:** IP address, browser type, device identifiers, geolocation data, and website activity.
- **Communications Data:** Correspondence, emails, call recordings, and instant messaging interactions.
- **Regulatory & Compliance Data:** Know-Your-Customer (KYC) and Anti-Money Laundering (AML) documentation, sanctions screening, and due diligence records.

How we collect your personal data

We collect your personal data through various methods, including:

- Directly from you (e.g., via forms, contracts, or correspondence).
- Automatically through our website and trading platforms (e.g., cookies, log files).
- From third parties, including financial institutions, regulatory authorities, data providers, and publicly available sources.

Purposes of processing

We process your personal data for the following legitimate business and legal purposes:

- **Provision of Services:** To provide high-frequency trading (HFT) services, execute trades, process transactions, and maintain client relationships.
- **Regulatory Compliance:** To meet our obligations under Cayman Islands financial regulations, AML laws, and applicable securities laws.
- **Risk Management & Fraud Prevention:** To detect and prevent fraudulent activities, cybersecurity threats, and financial crimes.
- **Business Operations & Communications:** To manage our internal business operations, IT systems, and respond to inquiries.
- **Marketing & Analytics:** To enhance our offerings and provide relevant market insights (only where permitted by law).

Legal basis for processing

Under the **Cayman Islands Data Protection Act**, we rely on the following legal bases for processing personal data:

- **Performance of a Contract:** Processing necessary for fulfilling contractual obligations.
- **Legal Compliance:** Processing required for compliance with laws and regulations.
- **Legitimate Interests:** Processing for operational, security, or risk management purposes.
- **Consent:** Processing based on your explicit consent (where applicable).

Data sharing & third parties

We may disclose your personal data to:

- **Regulatory Bodies & Authorities:** Including the Cayman Islands Monetary Authority (CIMA) and other regulatory agencies as required by law.
- **Service Providers & Partners:** Cloud service providers, payment processors, legal advisors, auditors, and compliance consultants.
- **Affiliates & Group Companies:** Entities within the 42 corporate structure for operational purposes.
- **Financial Counterparties:** Brokers, liquidity providers, and financial institutions engaged in trading activities.

We do not sell or rent personal data to third parties. Data transfers to jurisdictions outside the Cayman Islands will be conducted in compliance with applicable data protection laws.

Data retention

We retain personal data only for as long as necessary to fulfil the purposes for which it was collected, including compliance with legal, regulatory, and contractual obligations. Standard retention periods include:

- **Regulatory Records:** At least 5 years following the end of the client relationship.
- **Trading & Transaction Data:** As required by financial authorities.

- **Marketing & Communications Data:** Retained until consent is withdrawn.

Data security

We implement robust security measures to protect personal data, including encryption, access controls, firewalls, and monitoring. While we take all reasonable steps to secure data, no system is completely immune from cyber threats.

Your rights

Under the **Cayman Islands Data Protection Act**, you have the right to:

- **Access:** Request copies of personal data we hold about you.
- **Correction:** Request corrections to inaccurate or incomplete data.
- **Deletion:** Request deletion of your data (subject to legal obligations).
- **Objection & Restriction:** Restrict or object to certain types of data processing.
- **Data Portability:** Receive your data in a structured format for transfer.

To exercise these rights, please contact us at info@42.com. We may require proof of identity for security reasons.

International data transfers

If we transfer your data outside the Cayman Islands, we ensure adequate safeguards are in place, such as contractual clauses or reliance on legally approved frameworks.

Cookies & tracking technologies

Our website uses cookies and similar technologies to enhance user experience, analyse site traffic, and improve our services. You can manage cookie preferences through your browser settings.

Changes to this policy

We may update this Privacy Policy periodically. Any changes will be posted on our website with the updated date. Please review this policy regularly to stay informed.

Contact information

If you have any questions or concerns about this Privacy Policy or your personal data, please contact us at info@42.com.

Governing law and jurisdiction

This Privacy Policy is governed by and shall be interpreted in accordance with the laws of the Cayman Islands. Any disputes shall be subject to the exclusive jurisdiction of the Cayman Islands courts.