



General Data Protection Regulation (GDPR)

Your Rights Under EU & UK Data Protection Law

Effective Date: June 5, 2026 · DTG Research LLC · Reg. No. 2025-001625871

1. Scope

This page sets out the specific rights and protections available to users of DTG Sentinel located in the EEA or UK under the GDPR (Regulation (EU) 2016/679) and UK GDPR. It supplements our Privacy Policy and should be read alongside it.

2. Data Controller

DTG Research LLC · Reg. No. 2025-001625871 · 2232 Dell Range Blvd., Suite 245, Cheyenne, Wyoming 82009, USA · legal@dtg-sentinel.com

We do not currently have a formally appointed Data Protection Officer (DPO) or EU Representative, as our processing activities do not meet the thresholds requiring mandatory appointment under Article 37 GDPR. We will appoint a DPO or EU Representative if and when required by applicable law.

3. Personal Data We Process

- Identity and contact data: name, email address.
- Authentication data: hashed passwords, session tokens.
- Financial data: billing address and payment transaction records (card numbers are processed by our payment processor and not stored by us).
- Usage data: terminal functions accessed, commands entered, session durations, feature interactions.
- Technical data: IP address, browser type, operating system, device identifiers.
- User-generated data: portfolio positions and watchlist instruments you enter manually.

We do not process any special category data (Article 9 GDPR) such as health data, biometric data, or political opinions.

4. Legal Bases for Processing

- Article 6(1)(b) — Contract: processing necessary to deliver the Service, including account authentication, payment processing, and personalised terminal features.
- Article 6(1)(c) — Legal obligation: retention of billing and transaction records as required by applicable financial and tax laws.
- Article 6(1)(f) — Legitimate interests: security monitoring, fraud prevention, anonymised product analytics, and direct marketing to existing subscribers. You may opt out at any time.
- Article 6(1)(a) — Consent: non-essential cookies and marketing communications to non-subscribers.

5. Automated Decision-Making

We do not use your personal data for automated decision-making that produces legal or similarly significant effects (Article 22 GDPR). AI-generated market summaries are based on aggregated market data, not on your personal data.

6. Your Rights Under GDPR

To exercise any of the following rights, contact legal@dtg-sentinel.com. We will respond within one calendar month (extendable by two further months in complex cases, with notice).

Right of Access (Article 15)

You have the right to obtain confirmation of whether we process your personal data and, if so, to receive a copy together with information about the purposes, categories, recipients, retention periods, and the existence of your other rights.

Right to Rectification (Article 16)

You have the right to require correction of inaccurate personal data and completion of incomplete data without undue delay.

Right to Erasure / Right to be Forgotten (Article 17)

You have the right to request deletion of your personal data where it is no longer necessary for the purpose collected, you withdraw consent, you object and there are no overriding grounds, or processing has been unlawful. This right does not apply where we are required to retain data to comply with a legal obligation.

Right to Restriction (Article 18)

You may request restriction of processing where you contest accuracy, processing is unlawful and you prefer restriction over erasure, we no longer need the data but you require it for legal claims, or you have objected pending verification.

Right to Data Portability (Article 20)

Where processing is based on consent or contract and carried out by automated means, you have the right to receive your personal data in a structured, machine-readable format (JSON or CSV) and to transmit it to another controller.

Right to Object (Article 21)

You have the right to object at any time to processing based on legitimate interests, including profiling. You have an unconditional right to object to processing for direct marketing. We will cease immediately upon receipt.

Right to Withdraw Consent (Article 7(3))

Where processing is based on consent, you may withdraw it at any time. To withdraw consent for marketing communications, use the unsubscribe link in any email or contact legal@dtg-sentinel.com.

7. Complaints

If you believe we have not complied with GDPR, you have the right to lodge a complaint with your national supervisory authority. A list of EEA authorities is at <https://edpb.europa.eu>. UK residents may contact the Information Commissioner's Office (ICO) at <https://ico.org.uk>. We encourage you to contact us first at legal@dtg-sentinel.com.

8. International Transfers

Personal data from EEA and UK users is transferred to the US under the European Commission's Standard Contractual Clauses (SCCs) — Module 2 (controller to processor), Commission Implementing Decision 2021/914. For UK transfers, we use the UK IDTA. Data is stored with row-level security controls and encrypted at rest. A copy of the applicable transfer mechanism is available on request from legal@dtg-sentinel.com.

9. Retention

Account data is deleted within 90 days of account closure. Billing records are retained for 7 years. Anonymised analytics data may be retained indefinitely. Full retention periods are set out in the Privacy Policy.

10. Contact

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