

1. Data Controller

Cephic, a sole proprietorship (eenmanszaak), registered in the Netherlands, KVK **42161138**, VAT/BTW ID **NL005545576B75**, registered address Rondveld 40, 5629 CV Eindhoven, The Netherlands. Contact for privacy matters: support@cephic.io.

2. What We Collect

2.1 Account data

Email address and password (hashed, via Supabase authentication), account creation date, subscription tier.

2.2 Calculate — free calculators

When used without an account, no data is stored; calculations run entirely in the browser and nothing is transmitted to Cephic's servers.

2.3 Calculate — Chrome extension

Saved risk-percentage presets are stored locally in your browser (via the extension's local storage permission) and never sent to Cephic. The extension is free today, with no license key or account requirement; if that changes, this section will be updated first.

2.4 Allocate

Uploaded MT4/MT5 backtest reports are parsed in the browser. Only aggregated, anonymised statistics — not raw trade data — are transmitted to Cephic's servers to generate an AI-written grade summary via the Anthropic API. Saved portfolios (strategy selections, allocation results, portfolio names) are stored in Cephic's database, linked to your account, so you can return to them later. If you use Allocate's AI assistant panel, your messages and the aggregated portfolio statistics relevant to your question are sent to the Anthropic API to generate a response.

2.5 Watchdog

To monitor a live or demo trading account, you install the Cephic Watchdog Expert Advisor ("the EA") in your own MT4/MT5 terminal and pair it to your account using a one-time pairing code you generate yourself. Cephic never asks for, receives, or stores your broker username or trading password — the pairing code is the only credential involved, and it authorises reporting only, never trading. On a timer your EA controls, it reports your account's balance, equity, broker and server name, account (login) number, platform, and recently closed trades to Cephic's servers, so Watchdog can calculate live drawdown, compare it against your backtest data (if provided), and check it against your configured limits and personal trading rules. Disconnecting an account, from your account settings, immediately and permanently deletes its stored equity history, trade records, and pairing credentials.

2.6 Payment data

Handled entirely by Stripe. Card details are not stored by Cephic. Cephic receives only transaction confirmation, subscription status, and billing email from Stripe.

2.7 Error monitoring

On deployments where it is enabled, the backend reports unhandled errors to Sentry to help diagnose bugs. This can include technical request metadata (such as IP address and the API route called) but not your trading data, backtest files, or portfolio contents. Cephic does not otherwise run any web analytics or ad-tracking tool; if that changes, this Policy will be updated first.

3. Legal Basis for Processing (GDPR Article 6)

- Account and payment data: performance of a contract (Art. 6(1)(b)).
- Live account data (Watchdog): performance of a contract, entered into on your explicit action of pairing an account (Art. 6(1)(b)), combined with your explicit consent to the connection itself (Art. 6(1)(a)).
- Error/crash diagnostics: legitimate interest in keeping the service working correctly (Art. 6(1)(f)).

- Service-related communications: performance of a contract / legitimate interest, as applicable.

4. Sub-Processors

Data is shared with the following sub-processors, each processing data on Cephic's behalf under their own data-processing terms. As required under GDPR Article 28, a Data Processing Agreement or equivalent data-processing terms must be in place with each — confirm this has been accepted for every provider below (typically via the provider's own dashboard settings or standard terms) before publication.

Provider	Purpose	Data involved
Stripe	Payment processing	Billing email, transaction status. No card details.
Supabase	Authentication & database	Account credentials, saved portfolios, app data.
Anthropic	AI-generated analysis	Aggregated backtest statistics; assistant-panel messages.
Vercel	Frontend hosting	All frontend application data in transit.
Railway	Backend hosting	All backend application data in transit and at rest.
Sentry	Error monitoring (where enabled)	Technical crash/request metadata, not trading data.

5. Live Account Data — Specific Commitments (Watchdog)

- Connection is by one-time pairing code, not broker credentials. Cephic never requests, receives, or stores your broker username or trading password.
- The connection is one-way and read-only: Cephic cannot place trades, modify orders, or withdraw funds through it, under any circumstance.
- Disconnecting an account, or deleting your Cephic account entirely, immediately and permanently deletes all stored equity history, trade records, and pairing credentials for it — there is no retention delay.
- Live account data is used exclusively to power Watchdog's own features for your account — it is not used for any other purpose, and not shared with any party beyond the sub-processors listed in Section 4.

6. Data Retention

Account data is retained while your account remains active. If you delete your account, all associated data — including saved Allocate portfolios and any Watchdog data — is deleted immediately via cascading deletion, not on a delay. Billing records that Cephic (or its payment processor, Stripe) must keep for Dutch tax and bookkeeping purposes are retained separately for the statutory period (generally 7 years under Dutch law) regardless of account deletion, as required by law.

7. Cookies

Cephic uses a limited set of cookies:

- Essential cookies, required for login sessions (via Supabase authentication) and core functionality, which cannot be disabled.

Cephic does not currently use analytics, advertising, or third-party tracking cookies. If that changes, this Policy will be updated first, and consent will be requested where required before any non-essential cookie is set.

8. Your Rights (GDPR)

Users in the European Union have the right to: access personal data held about them; correct inaccurate data; request erasure ("right to be forgotten"); receive data in a portable format; object to or restrict certain processing; and withdraw consent at any time.

- **Deletion:** delete your own account instantly, self-serve, from account settings — this permanently and immediately removes your account and all associated data (Section 6).

- **Access, correction, export, or objection:** email support@cephic.io. There is no self-serve data-export button yet; requests are handled manually and promptly by a real person.

Users also have the right to lodge a complaint with the Dutch Data Protection Authority (Autoriteit Persoonsgegevens) or their own EU/EEA country's supervisory authority.

9. Security

Reasonable technical and organisational measures are taken to protect user data, including encryption in transit via HTTPS, and password hashing via Supabase authentication. Watchdog's live-account connection never transmits or stores a broker password in the first place, by design (Section 2.5), which removes an entire category of risk rather than merely securing it. No system is completely secure, and absolute security cannot be guaranteed.

10. International Transfers

Certain sub-processors (for example, Anthropic, Stripe, Vercel, Railway, and Sentry) may process data outside the EU/EEA. Where this occurs, Cephic relies on their compliance with approved safeguards, such as Standard Contractual Clauses.

11. Children's Privacy

Cephic is not directed at individuals under the age of 18. Cephic does not knowingly collect personal data from minors.

12. Changes to This Policy

This Policy may be updated periodically. Material changes will be communicated by email or in-app notice.

13. Contact

Privacy-related questions or requests may be directed to support@cephic.io.
