#### **PRIVACY POLICY**

(Version from 30/10/2018)

### 1.General terms

1.1. We are committed to protecting the privacy of our Clients' personal data. This document details the procedures relevant to the process of personal data storage and protection.

#### 2.Client data

- 2.1. The Company reserves the right, in order to improve the quality of our services, to speed up the processing of incoming requests, distribute information about the Company's products and services, as well as to comply with our "Anti-Money Laundering" and "Know Your Customer" Policies, to request the Client to submit all data necessary for his/her identification documents.
- 2.2. The Client is liable for the accuracy of data provided by him/her through the registration form in the Client Cabinet.
- 2.3. The Client must ensure that documents provided by him/her during the verification procedure, or when updating his personal and contact details, are authentic and belong personally to him/her.
- 2.4. The Client herby gives consent to the entry and storage of this personal data into the Company database.
- 2.5. The Company undertakes and warrants to keep all information provided by the Client during registration and for the entire duration of his/her relationship with the Company confidential and not accessible to any third party, except to the extent provided in paragraphs 4.2 and 4.3 hereof.

## 3.Information security

- 3.1. The Company uses SSL technology to maintain security and confidentiality of the Clients' personal data. This technology uses a special secure channel to transmit data, thus rendering its interception by third parties impossible. Additionally, the Company operates a strict internal policy that ensures that only a very limited number of its employees have access to Client data. latest advances in data security are used, which enables our company to maintain a high standard of data protection.
- 3.2. The responsibility for ensuring confidentiality of personal passwords, user names and other information needed to access the Trader Room and trading accounts lies entirely with the Client.
- 3.3. The Client is fully responsible for all his/her actions and transactions carried out using the user name and password, which is provided to him by the Company or generated by the Client him/herself.

## 4.Use of personal data

- 4.1. The Client grants to the Company the right to process personal data transferred to the Company, on the basis of the Privacy Policy set forth in this document.
- 4.2. The Client agrees that the Company may transfer his personal and contact details, as well as any other personal information, to its Partners only under the condition that they will maintain the same high level of information security and confidentiality.
- 4.3. To the extent permitted by law or subject to an official request, the Company may transfer the Client's personal data to the law enforcement or other government authorities.

# 5. Refusal to provide personal data

- 5.1. The Client has the right to refuse to transfer certain types of personal data to the Company.
- 5.2. The Client acknowledges that such a refusal to transfer the necessary data to the Company may limit the range of services provided to him by the Company or reduce their quality.