



# **PRIVACY POLICY**

## PRIVACY POLICY

### 1. Introduction

This Privacy Policy applies to all organizations within the IronFX Global group of companies including IronFX Global Limited (“Company”). This Policy outlines how the Company collects, maintains, uses and discloses personal information about you.

This Policy applies to existing and potential clients as well as to any visitors of the Company website.

The Company is committed to protecting the privacy of all personal data which it obtains from you, including information obtained during your visits to this website.

### 2. Collection of Personal Data

The Company will only use your personal data in accordance with worldwide data protection practices. The Company is registered as a Data Controller with the Office of the Commissioner for Personal Data Protection under the Processing of Personal Data (Protection of Individuals) Law 138(I)/2001 (the “Law”) and will process personal data only in accordance with Cyprus data protection legislation, this Privacy Policy and the Trading Terms and Conditions of the Company.

The Company will collect and hold personal data about you when you complete an online application for a live or demo account or other type of form or when participating in any other offer the Company promotes through this website.

The Company collects certain personal data in order that it may meet the needs of its customers through the efficient provision of services. By collecting certain personal data, the Company is able to monitor and improve the services which it offers to its existing and potential customers.

Personal data collected includes but is not limited to:

- Personal details such as name, address, telephone number and/or e-mail address;
- Financial details such as estimated annual income and net worth, trading experience and investment knowledge;
- Identity Verification Documents such as passport and ID, utility bills, and/or bank statements or your company incorporation certificates/details.

The Company may derive information from your use of this website and may store this information with your personal profile. This information may include site areas visited, pages viewed, frequency and duration of visits, types of transactions conducted, documents downloaded and other websites which may have referred you or to which you link.

### 3. Use of Personal Data

The Company may use your information for any one or more of the following purposes:

- To confirm your identity;
- To maintain your personal profile;
- To assess your suitability to the products and services we provide;
- To provide the services to you that you have requested including processing transactions;
- To provide you with transaction and post transaction related services;
- To inform you of products and/or services that may be of interest to you;
- To keep you updated on the issues that are relevant to your business relationship with us;
- To tailor the website to your needs and interests;
- To analyze impersonalized statistical data to enable us to provide you with better products and/or services.
- To administer your account and monitor its conduct and assess and analyse any credit limit, including, the interest rate, fees and other charges to be applied to the Client's Account;
- To pass your personal data to third parties for marketing purposes without prior written consent;

### **3.1 Retention of Personal Data**

The Company will, as required by Law, retain your Personal Data on record for a period of at least five (5) years, which is calculated after the execution of the transactions or the termination of the business relationship or in case of termination of our business relationship.

### **3.2 Monitoring and Recording**

The Company will, as required by Law, monitor and record any communication you have with us whether in writing, by phone or by electronic mail.

### **3.3 Consent**

You consent to the Company using your personal data for the above-stated purposes.

## **4. Disclosure of Personal Data**

The Company may be required to provide your personal data to the Cyprus Securities and Exchange Commission and other regulatory and government bodies in Cyprus and other countries as may be required by law from time to time.

The Company will disclose your Personal Data, without notice when required to do so by law or in good faith that such action is necessary to: (a) protect our rights and/or comply with any court order or judicial proceedings; (b) avoid any potential fraud; (c) conform to the edicts of the law or comply with a legal process served on the Company or on the Company's website; (d) protect and defend the rights or property of the Company (and Group Companies') websites, and, (e) act in urgent circumstances to protect the personal safety of users of the Company, its websites, or the public

### 4.1 The Company may also disclose your personal data to:

- The Company's Introducing Brokers or any other Group Companies ("Processors"), who process data on behalf of the Company and who may only use it for the same purposes as the Company, subject to Clauses 4.2 and 4.3 below.
- Companies it hires to provide limited services on our behalf, including packaging, mailing and delivering purchases, postal mail, etc. The Company will ensure that none of your Personal Data will be disseminated to those companies; the companies will only be subject to the information they need to deliver the service, and they are prohibited from using the information for any other purpose.
- financial institutions and other similar organizations that it deals with in the course of its corporate activities, or those that are nominated by you;
- external service providers and professional advisers (which may be located overseas) that provide services to the Company;
- any organisation at your request or any persons acting on your behalf, including your financial adviser, broker, solicitor or accountant;
- any third parties where this is necessary to process a transaction or provide services which you have requested; or
- any authority to whom the Company is required to disclose such information by law.

### 4.2 Warranties

The Processors shall ensure that:

- a. the Processor's employees are informed of the confidential nature of the Personal Data; and
- b. it will process the Personal Data in compliance with all applicable laws, enactments, regulations, orders, standards and other similar instruments.

### 4.3 Indemnity

The Processors agree to indemnify and keep indemnified at its own expense the Company against all costs, claims, damages or expenses incurred by the Company or for which the Company may become liable due to any failure by the Processor or its Employees to comply with any of its obligations under this Privacy Policy.

### 4.4 Statistical data

The Company may combine your personally identifiable data with information from other users of this website to create impersonalized statistical data. The Company may provide this statistical data to its business partners or third parties. In no circumstances will you be able to be identified from this statistical data; you will remain anonymous.

## 5. Your Rights

You are not obligated to provide any of the personal data requested by the Company. In the absence of this information, however, the Company may not be able to open an account for

you where the information is requested in on an application form, or to provide you with any other services, information or assistance you have sought.

Under the Cyprus data protection legislation, you have (subject to certain exceptions) the right to request any personal data the Company holds about you and to inform the Company of any perceived inaccuracy. We may charge a fee to cover the associated administrative costs.

You may inform the Company at any time that your personal details have changed or that you wish the Company to delete personal data we hold about you by emailing us at [compliance@IronFX.com](mailto:compliance@IronFX.com). The Company will change or delete your personal data in accordance with your instructions, except to the extent that we are required to hold your personal data for regulatory or legal purposes, to provide you with the services you have requested or to maintain adequate business records.

If you have any questions, complaints or requests, please write to the Company, verifying your identity and setting out in full what information you require. If a complaint is not resolved by the Company to your satisfaction, you may complain to the Information Commissioner.

### **6. Consent**

By accessing this website, you consent to the Company collecting, maintaining, using and disclosing personal data about you and provided by you or by another person as in accordance with this Privacy Policy.

### **7. Links**

When you use this website, you may be able to link to other websites. This Privacy Policy does not apply to those other sites. The Company encourages you to read and understand the privacy policies on these other sites.

### **8. Cookies**

The Company uses cookies to gather information about your access to our website and other services we provide to you. Please note that this description is not comprehensive and the Company's Cookie Policy contains additional information.

Cookies are small pieces of information which use a unique identification tag and are stored on your device as a result of you using this website or other services we provide to you.

Most internet browsers are set up to accept cookies. If you do not wish to receive cookies, you may be able to change the settings of your browser to refuse all cookies or to have your computer notify you each time a cookie is sent to it, and thereby give yourself the choice whether to accept it or not. However, it is strongly recommended that you allow cookies on our website to ensure you have the best possible experience. Turning off cookies may result in reduced performance of our website and trading platform and may also impair the quality of the services that we provide to you in relation to your account.

### 9. Security

The Company adopts strong measures to protect the security of your Personal Data and to ensure it is not accessed by unauthorised persons. Access to Personal Data is restricted to employees and authorized service providers who need it to perform their work. You must not share or disclose your log in details with any third party.

The Company takes strong precautions to protect your personal data from loss, theft, copying, misuse, unauthorised access or disclosure, alteration, or destruction. Measures include encryption during data transmission, strong authentication mechanisms and separation of machines and data to provide secure areas.

### 10. Amendments to policy

The Company reserves the right to make changes this Privacy Policy from time to time for any reason and will notify you of such changes by posting an updated version of this Privacy Policy on this website. You are responsible for regularly reviewing this Privacy Policy and if you use this website after any such changes are published, such use shall constitute your agreement to such changes.

All queries should be emailed to us at [compliance@IronFX.com](mailto:compliance@IronFX.com).

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