



# **PRIVACY POLICY**

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This statement outlines the policy, of Notesco Limited (the “**Company**”) and its Affiliate Members (both the Company and its Affiliate Members hereinafter be referred jointly as the “**Companies**”, “**we**”, “**us**” or “**our**”), on how the Companies manage the personal information that they hold about the Company’s clients, vendors and others (“**you**” or “**your**”). This privacy applies to all website users, whether you are a former, existing or potential client or just a visitor of our website. The Companies are the data controllers for purposes of the data protection legislation.

Your privacy is of the utmost importance to everyone involved. To protect your privacy, we follow different principles in accordance with worldwide practices for client privacy and data protection. This Privacy Policy outlines the basis of how we process your personal data which we either collect from you or you voluntarily provide to us. Please read this Policy carefully in order to understand how we process your personal data, whether you are completing an application or form, or receiving important disclosure documents from us, such as terms and conditions.

By registering an account with the Company or by using [www.ironfx.com](http://www.ironfx.com) (the “**Website**”) and/or our applications, you expressly and impliedly consent to the contents of this Policy and how we use, store or share your personal data. In the event you disagree with our processing, you are requested to leave our website and stop using our services and/or products.

### **1. What personal data we collect or receive about you and when**

The personal information that will be collected from you may include the following:

- Personal details you provide to us on applications and other forms, such as full name, address, contact details, tax number, date of birth and gender;
- Any data we automatically collect when you use our services and/or access our Website, such as IP address, approximate location, device type, operating system, login and logout information, account settings, transactions conducted, messages, photos and videos you have shared with us, your app activity;
- Financial details which we are requested by AML Laws to collect from you such as estimated annual income, transaction history, user payment information, net worth, your trading experience, source of wealth, occupation and investment knowledge;
- Any data you provide to us to verify your identity, such as your passport, utility bills, bank statement and driver’s license;
- Any data you provide to us to verify and/or onboard your company, such as your company incorporation details, directors, agents, beneficial owners and trustees.

We may collect (or receive) and process your personal data when:

- (a) You visit the Website.
- (b) You register an account with us.
- (c) You get in touch with us via several communication methods.
- (d) You complete surveys and other feedback forms for research purposes.
- (e) You deposit and withdraw with us.
- (f) You use our services, applications, products via accessing your trading account.

- (g) You use and interact with our Website or our app or through the use of email and website cookies and similar marketing tools built into our Website and applications.

### **2. How we use the personal data we collect**

- Considering our nature of business and to perform our services offered to you efficiently, we will collect, use, disclose, transfer and store your personal data when needed in order to perform the services you assigned us with.
- We will use your personal data to get in contact with you, to furnish you with information about the products you trade, any details of your account and any other information about our services which may be of interest to you.
- We will not sell or give away your name, mail address, phone number, email address or any other information to anyone, except as described in this policy.
- We will use various security measures to protect your information from unauthorised users.
- We will pass your personal information to the Companies, to technology providers and/or social trading businesses.

You can control the notifications you receive from us and the processing of your data by following the instructions when registering with the Company.

The Companies may use your personal information for one or more of the following purposes:

- to verify your identity and to introduce you to our Affiliate Members, to treat you fairly, and to understand your financial objectives and to provide you with sales and post sales services.
- to provide you with the information, products and services you requested and carry our contractual obligations;
- to assess your suitability to the products and services our Affiliate Members provide;
- to process your transactions and payments;
- 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 the Companies;
- to deal with and respond to your complaints, requests, inquiries;
- to develop and monitor the Website;
- to analyse statistical data to enable us to improve our products and/or services;
- to detect, investigate and prevent potentially prohibited or illegal activities; and
- to comply with all the regulations, guidelines and applicable law.

### **3. We will record you**

Subject to AML Laws and other applicable laws, we will record all communications without any prior warning between you and us. This includes communication conducted in electronic form either written or unwritten form, by telephone or otherwise. In addition to this, we will record telephone calls with you in order to comply with regulations, for quality assurance purposes and for investigations that may be conducted.

#### **4. How we protect your personal data**

We will protect your personal data at all costs from any misuse, unauthorized access, alteration, destruction and disclosure. The Companies have taken strong measures to protect the security of your personal information and to ensure that your choices for its intended use are honored. We maintain strict security information policies which allow us to improve our security environment in order to eliminate any data breach incidents. We provide regular training to employees on personal data protections and have several authentication when access our systems. We take regular risk assessments and security testing of our infrastructure and use dedicated secure networks.

You also have a significant role in protecting your information. We will provide you with unique credentials to access your trading account and/or enter into transactions or dealings with or through the Company. You should ensure confidentiality of your credentials and not share them with any other third party.

No one can see or edit your personal information without knowing your user name and password, so do not share these details with others.

#### **5. Retention Period**

We generally need to keep your personal information 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 the case you wish to terminate your working relationship with us. Subject to that, when we consider information is no longer needed, we will remove any details that will identify you or we will securely destroy the records.

#### **6. To whom we will disclose your personal data**

We occasionally engage external companies to provide limited services on our behalf, including sending newsletters and other correspondence via electronic means or via postal mail, etc. We will only provide these companies the information they need to deliver the service and they are strictly prohibited from using that information for any other purpose.

For the purposes of this Policy, we will also disclose your personal data to other associates we work with in order to fulfil our contractual obligations with you, including:

- (a) Introducing brokers,
- (b) Service providers and specialist advisers,
- (c) Any member of our group of companies, either subsidiary or holding company or affiliated company,
- (d) Analytics and search engine providers,
- (e) Courts, tribunals, governmental bodies, law enforcement agencies or other third parties we are required to do so by law,
- (f) Your appointed attorney, solicitor, accountant, executor, administrator or trustee, and
- (g) To any other person you have given consent to.

We will not sell, rent or otherwise any of your personal data to third parties unless you consent or is vital for us to perform our contractual obligations.

Further to the above, the Companies will disclose your personal information, without notice when required to do so by law or in good faith that such action is necessary to:

- (a) protect the Companies' 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 us, our Affiliate Members or the site;
- (d) protect and defend the rights or property of us, our Affiliate Members and its family of Websites, and,
- (e) act in urgent circumstances to protect the personal safety of users of the Companies, its Websites, or the public.

### **7. We may collect information from third parties**

There may be occasions when we may collect personal information about you from a third-party, including:

- Payment providers, Affiliate Members, or other companies which we work with to gather information about the products offered to you.
- Organizations we have contractual relationships with.
- Brokers and/or other related entities who may have introduced you to us.
- Marketing companies in order to provide products or services which may interest you.

We may also collect information about how you use our website and/or other websites to better tailor our services to you. This can occur automatically when you click on a link from our website, visit an external site displaying our advertisement, or log into our online portal or service (for more information, see section 9 below).

### **8. Third party login**

You have the option to log in to your account by using third-party service providers or social network platforms such as Facebook or Google. If you choose to log in by using a social network or similar service, we may receive and store authentication information from that service to enable you to log in and access your account. We also reserve the right to store other information that you may choose to share with us when you connect via these services.

Third party services may collect confidential information, including the website you visited and IP addresses, and may set cookies to enable features to function efficiently. We are not responsible for the security or privacy of any information collected by these third parties. We recommend reviewing the privacy policies of these third-party services which you may use to connect to your account with us.

### **9. We use cookies**

We use cookies to gather information about your access to our Website and other services we provide to you. Cookies are small files of letters and numbers, which use a unique identification tag and if you agree, they are stored on your device as a result of you using this Website or other services we provide to you. These cookies allow us to distinguish you from

other users of our website, which helps us to provide you with a good experience when you browse our Website and allows us to improve our Website.

Please click at the relevant point on our web page to confirm that you agree to our use of cookies on your device.

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, this may impair the quality of the services that the Companies provide to you in relation to your account.

### **10. What are your rights**

Subject to exceptions, you are entitled to exercise the below rights regarding your personal data:

- (a) You have the right to obtain a copy of any personal information which the Companies hold about you and to advise us of any perceived inaccuracy.
- (b) You have the right to ask for correction of your personal data that we hold about you;
- (c) You have the right to ask for erasure of your personal data, however please note that we may not always be in a position to fulfil this request due to legal or regulatory reasons.
- (d) You can request the transfer of your personal data to you or third party which you initially consented to us to process.
- (e) You can withdraw consent at any time if we are relying on your consent to promote our services and/or products to you.

For any of the above request or if you have any concern relating to your privacy, you can contact the Company by e-mail at [support@ironfx.com](mailto:support@ironfx.com). To make a request, please e-mail us, verifying your identity and specifying what information you require. We may charge a fee to cover the cost of verifying the application and locating, retrieving, reviewing and copying any material requested. We will acknowledge your request and respond to it within 30 days of receipt of your application and any applicable fee.

### **11. Use of your personal data to other websites**

This Website may have links to external third-party websites that may benefit you. If you disclose your personal data to any other website that we link to, that third party websites are not covered by our privacy policy and these sites are not subject to our privacy standards and procedures. You are strongly advised to review the policy of each website you visit and contact the operator of the specific website should you have any questions.

### **12. Where we store and process your personal data**

The personal data we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”). In such cases, we will ensure that the processing takes effect in jurisdictions that have been found to uphold an adequate level of protection of personal data. In the event this is not possible, we will ensure there are sufficient legal mechanisms to safeguard the processing of personal data.

We kept your personal data secure and protected in accordance with our legal obligations and standards. In the event where we are mandated to disclose your personal data, we will ensure that the sharing is lawful and legitimate.

### **13. We may change this Privacy Policy**

We reserve the right to change this policy anytime without any prior notice to you. In the event of such amendments on the Policy, we will upload the newest version to the Website and on our app. It is important to review the updated Privacy Policy each time you submit your personal data to us.

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