

Private Policy

1. Introduction

HTFX VU Limited is a company incorporated and registered in Vanuatu under registration No.700650 having its registered address situated at Law Partners House, Kumul Highway, Port Vila, Vanuatu.

The Company is an investment firm operating as an international foreign exchange broker under the provision of the applicable law.

2. General

This policy sets out the procedures and methods used by the Company to collect, use and manage personal information from its visitors, potential and active clients through the Company's website. By opening a Demo or Live account with the Company, the client hereby gives its consent to such collection, processing, storage and use of personal information by the Company as explained below.

The collection of personal information

The Company collects the necessary information required to open a client's Demo or Live account, perform transactions and safeguard the clients' assets and privacy and to provide clients with the services they require. In this respect, the Company gathers information from clients and may, in certain circumstances, gather information from banks and/or credit agencies, and/or clearing agencies and/or other sources which will help the Company to construct the clients' profile based on their requirements and preferences in order to provide its services effectively.

Personal data collected but is not limited to:

- Personal details such as first name, last name, nationality, date of birth, postal address, telephone number, fax and email address;
- Identity Verification Documents such as passport and ID, utility bills and/or bank statements or your company incorporation certificates/details;
- Family and Professional details such as information on your marital status, education, profession, employer name, knowledge in forex industry and risks;
- Financial details such as annual income, net worth, source of funds, anticipated account turnover, bank account, IBAN number SWIFT/BIC number, bank statements, payment card details and copies, E-wallet information;
- Tax details such as country of tax residence and tax identification number;
- If you are a corporate client we are required to collect additional information such as corporate documents of address, shareholders, directors, officers including additional personal information on the Shareholders and Directors;

We may also collect your information in regard to your use of our Website and may store this information with your personal profile. This information may include site area visited, pages viewed, frequency, duration of visit and trading activities.

We need to collect your personal data as part of statutory obligations or as part of the contractual arrangements we have with you. If you fail to provide that data when requested, then we will not be allowed to commence or continue our business relationship either to you as an individual or as the authorized representative/agent or beneficial owner of a legal entity.

3. Personal Information

HTFX Limited processes your Personal Data for one or more of the following purposes:

Performance of a contract

The processing of your personal data is necessary in order to provide our services and products, as well as information regarding our products and services based on the contractual relationship with you but also to be able to complete our acceptance procedure so as to enter into a business relationship with prospective customers. The purpose of processing personal data depends on whether the customer is a natural or legal entity, depends on the classification/ categorization of the client (i.e. retail, professional) and to the requirements for each service.

Compliance with a legal obligation

There are a number of legal obligations imposed by relevant laws to which we are subject, as well as specific statutory requirements. There are also various supervisory authorities whose laws and regulations apply to us. Such obligations and requirements impose on us necessary personal data processing activities for credit checks, identity verification, payment processing, compliance with court orders, tax law or other reporting obligations and anti-money laundering controls.

These obligations apply at various times, including client on-boarding/acceptance, payments and systemic checks for risk management.

For the purposes of safeguarding legitimate interests

The processing of your personal data is necessary for the purposes of the legitimate interests pursued by HTFX Limited, where those interests do not infringe your interests, fundamental rights and freedoms. These legitimate interests include business or commercial interests and examples of relevant processing activities include: preparing our defense in litigation procedures; preventing fraud and money laundering activities; managing business and further developing and marketing of products and services; means and processes we undertake to provide for the Company's IT and system security, preventing potential crime, asset security, admittance controls and anti-trespassing measures.

Marketing purposes

The Company may use client data, such as location or trading history to deliver any news, analysis, research, reports, campaigns and training opportunities that may interest the client, to their registered email address.

Protection of personal information

Any personal information provided by the client to the Company will be treated as confidential and shared only within the Company and its affiliates and will not be disclosed to any third party except under any regulatory or legal proceedings. In case such disclosure is required to be made by law or any regulatory authority, it will be made on a 'need-to-know' basis, unless otherwise instructed by the regulatory authority. Under such circumstances, the Company shall expressly inform the third party regarding the confidential nature of the information.

Retention of Personal Information

The Company will, as required by Law, retain your Personal Data on record for a period of maximum ten (10) 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.

When we no longer need personal data, we securely delete or destroy it.

Disclosure of your personal data

In the course of the performance of our contractual and statutory obligations and for legitimate business purposes, your personal data may be disclosed to various departments within the Company but also to other companies of the Group. Various service providers and suppliers may also receive your personal data so that we may perform our obligations.

Based on the above the Company may disclose your personal information to the following:

- Service providers, for business purposes, including third parties such as IT and system administration and professional advisers including lawyers, bankers, auditors and insurers who provide consultancy, banking, legal, insurance and accounting services;
- Any authority to whom the Company is required to disclose such information by law;

- Payment service providers;
- Our group companies and affiliates; and
- anyone authorised by you.

All third parties with which the Company shares personal information are required to protect such personal information in accordance with all relevant legislation and in a manner similar to the way the Company protects the same. The Company will not share personal information with third parties which it considers will not provide its clients the required level of protection.

In cases where clients have been introduced by a Business Introducer, such Business Introducer may have access to clients' information. Hence, clients hereby consent to the sharing of information with such Business Introducer.

Contact Clients

From time to time the Company may contact clients whether by phone or email for the purpose of offering them further information about the Company's contract for differences trading. In addition, the Company may, on occasion, seek to contact clients, whether by phone or by email, for the purpose of informing them of unique promotional offerings provided by the Company for the client. Clients consent to the receipt of such contact when they consent to our terms and conditions of use when registering with the Company. Any person wishing to opt out of further contact with the Company at any time whatsoever is entitled to do so, simply by contacting the Company whether by phone or email and requesting that no further contact on behalf of the Company be made.

4. General Requirements for Data Processing

a. Data processing means collection, recording, arrangement, storage, alteration, disclosing, consultation, extraction, use, transmission, cross-use transferring or granting access to third parties, interconnecting, closure, deletion or destruction of data, or several of the aforementioned operations, regardless of the manner in which they are performed or the means used;

b. The Company shall compile a list and documentation of means used in data processing and shall keep records of data processing. The list of means used in data processing shall include the name, type and number of the equipment and the name of the manufacturer of the equipment; the name and number of the licence of the software used and the name of the software manufacturer; the location of the documentation of the software used;

c. Persons engaged in the processing of data shall process data only for authorised purposes under the established conditions and according to the instructions and orders received, and they shall maintain the confidentiality of data which has become known to them in the course of performance of their duties and which are not intended for public use. Such confidentiality requirement continues after termination of the employment or service relationship with the Company;

d. Unauthorised processing of data (including recording, alteration, deletion, reading, copying, (transmission), unauthorised transportation of records and any other unauthorised use of data (not prescribed by official duties) shall be prohibited;

e. The Company shall implement adequate and sufficient measures to ensure that every data processing operation leaves a trace, which would afterwards enable identification of the person who performed the operation, the nature and time of the operation and any other relevant facts, including when, by whom and which data were recorded, altered or deleted, or when, by whom and which data in the data processing system were accessed, as well as information on any transmissions of data. A possibility for restoring the content of data before modifications shall be available when any modifications are made in data or documents;

f. Every user of database shall be issued personal means of authentication, enabling them to use the database. The access password for electronic databases shall be changed at least once a quarter. The

use of any means of automatic entry of passwords shall be prohibited. A user of the data processing system shall not have access to data, which are not required for authorised data processing and the performance of duties of that particular user;

g. Adequate security measures, including encryption of data if necessary, shall be implemented upon transmission of data by means of data communication equipment or in the transport of records;

h. The manager or an employee of the Company shall rely on justified expectation that data submitted by persons who submit data are correct. The manager or an employee of the Company shall, from time to time, verify the accuracy of data in the database(s) by requesting the data subject to check the data and, if necessary, make corrections or confirm the accuracy of data;

i. Any incomplete or incorrect data known to the manager or an employee of the Company shall be closed and any necessary measures shall be taken promptly to supplement and correct the data in question. Upon a request of a data subject, the manager or an employee of the Company shall correct any incorrect data on the data subject in the database if the data subject notifies the manager or employee of the Company of the inaccuracy of the data on the data subject and submits correct data; the incorrect data shall be stored with the correct data and with a note indicating in which period the incorrect data were used;

j. If the accuracy of data is in dispute, the data in questions shall be closed until confirmation of accuracy of the data or determination of correct data. Third persons who provided or received the data shall be promptly notified of any corrections made in data if it is technically feasible and does not lead to disproportionate expenses;

k. Automatic decisions of the data processing system, without participation of the data subject, shall be permitted only on the conditions and pursuant to procedures specified by the applicable law.

5. Rights of the Data subject

a. The data subject shall have the right to withdraw at any time the consent for the processing of personal data, in which case the Company shall cease processing the data to the corresponding extent;

b. Every person has the right to access data concerning themselves, which are collected in databases, unless this right is restricted by the applicable law. Decisions on granting or withholding authorisations for access to data and issuing copies of data shall be made by the executive manager of the Company;

c. Upon request of the data subject, the Company shall notify the data subject of the data, which is available on the data subject in the database, and the sources of such data, the purpose of data processing and any third parties or categories of third parties that have receive authorisation for data transmission, as well as any other facts of which the owner (processor) of the database is required to notify the data subject, unless the right of the data subject to receive information is restricted by the applicable law. The data shall be issued by using the method requested by the data subject, if possible, within five (5) business days from the receipt of the respective request;

d. In the cases specified by the applicable law, data shall be released to third parties with a statutory right to request and receive such data. In all other cases, data shall be released to third parties only if the data subject has granted a respective consent;

e. Authorised persons may review, on site in the Company, the documents on the establishment of databases and any other documents pertaining to the databases.

6. Data collected in databases

- a. The Company may collect in databases any publicly available data or any data voluntarily submitted by data subjects. Only data necessary for the provision of service to the clients and/or for the performance of operations requested by the clients may be requested from the clients;
- b. The Company shall collect and process the Clients' data to the extent, which is necessary for the achievement of specified objectives (provision of services), and in a manner, which is designed for the specific purpose. Unnecessary data shall be deleted or destroyed at once. Use of data in any other manner than previously agreed is permitted only with a respective consent of the data subject or on the conditions specified by the applicable law;
- c. The managers and employees of the Company shall register and preserve the data and documents associated with the provision of services, including:
 - i. documents, which specify the rights and obligations of the Company and the clients, or the conditions of provision of service by the Company to the clients;
 - ii. details of provided services and transactions and any communications between the clients and the Company to the extent, which ensures an overview of the actions of the Company in the provision of services.
- d. The managers and employees of the Company shall register and preserve the data on the decisions pertaining to the business and management of the Company, and preserve the internal procedure rules of the Company;
- e. A person appointed by the Management Board of the Company shall keep records of the documents of the Company and shall organise preservation and archival of such documentation the conditions and pursuant to procedures specified by law and internal procedure rules (including periods of preservation);
- f. The Company shall preserve data for at least five years, unless other terms for the preservation of data or documents are prescribed by the applicable law and the internal regulations of the Company or the decisions of the managing bodies of the Company;
- g. Client agreements and/or conditions of the provision of service by the Company to the Clients shall be preserved for at least as long as the contractual or other legal relationship connected to the provision of investment services or ancillary investment services to the Client continues, unless a longer term is specified by the applicable law.

7. Cookies

When using the Company's Website, we may use cookies to collect information. A cookie is a small data file that is stored on the Clients' computer, for the purpose of making it easier for them to navigate the Website by for example; remembering their IDs, passwords and viewing preferences, thus allowing them to visit member-only areas of the Website without logging in again. The Clients can set their web browser to inform them when cookies are enabled, or to disable cookies. If the Clients do not wish to receive cookies, most web browsers will permit them to decline/disable cookies and in most cases will still allow them complete access to our Website.

8. Tracking Systems

Tracking systems used on the Company's Website(s) may collect data detailing the pages you have accessed, how you discovered this site, the frequency of visits etc; this information is obtained in order to improve the content of the Company's website and may also be used to contact the Clients,

through any appropriate means and providing the Clients with any information the Company believes to be useful to them.

9. Security

The privacy and confidentiality of the Clients personal information is of fundamental importance to the Company. The Company takes all appropriate security measures to protect against unauthorized access to or unauthorized alteration, disclosure or destruction of data and personal information.

The Company restricts access to personal information to employees who need to know the specific information in order to operate, develop or improve Company's services. These individuals are bound by confidentiality and will be subject to penalties if they fail to meet these obligations.

10. Legal Disclaimer

The Company reserves the right to disclose the Clients' personally identifiable information as required by rules and regulations and when the Company believes that disclosure is necessary to protect their rights and/or to comply with a judicial proceeding, court order, or legal process served. The Company will not be liable for misuse or loss of personal information resulting from cookies on the Company's Website(s) that the Company does not have access to or control over. The Company will not be liable for unlawful or unauthorised use of Clients' personal information due to misuse or misplacement of your passwords, negligent or malicious.

11. Amendment/Review

The Company may update this Privacy Policy from time to time. In the event that the Company materially changes this Policy including how it collects, processes or uses clients' personal information we shall notify you accordingly, the revised Privacy Policy will be uploaded in the Company's website. The Company encourages its clients to periodically review this Privacy Policy so that they are always aware of what information the Company collects, how it uses it and to whom it may disclose it, in accordance with the provisions of this Policy.

Any personal information is treated as confidential and may be shared only within the Company, by its employees and affiliates for business purposes, as permitted by the applicable law. The information may be disclosed to third parties, such as the Company Partners and Affiliates for business purposes only, such as, but not limited to, servicing Client accounts and informing Clients about new products and services. The Company Partners, Affiliates, and Business Introducers maintain the privacy of Client's information to the same extent the Company does in accordance with the policy. Information may also be provided to non-affiliated companies, providing professional, legal, and accounting services. Non-affiliated companies that assist the Company in providing services to the Client are required to maintain the confidentiality of such information and to use Client's personal information only in the course of providing such services, for the purposes that the Company dictates and within the ambit of the applicable law.

The Company will not sell or give away Client's name, mailing address, phone number, email address or any other information to anyone. The Company will use various security measures to protect Client's information from unauthorized users.

The policy forms part of the Client's agreement, namely, the Client Agreement with the Company, thus the Client is also bound by the terms of this policy, as set out herein.