



# FxPro Privacy Policy

## Prime Ash Capital Limited

## Introduction

Protection of the personal customer information is a key responsibility and obligation of Prime Ash Capital Limited's (the "Company") management. This Privacy Policy outlines the procedure of collection, protection, keeping and use of Clients' personal data.

## Collection

The Company will be collecting personal data which is provided by Clients explicitly and knowingly. For the purpose of opening an account at the Company's trading platform, each Client must provide his/her Personal Data consisting of:

- Full name;
- Residential address;
- Date of birth;
- Annual income;
- Other personal details (upon necessity and request).

## Use of Data

The Company may process Clients' Personal Data on the following basis and for the following purposes:

- To carry out obligations arising from any agreements between a Client and the Company.
- For notifications about changes of products and/or services, as well as other important alterations affecting performance of an agreement between a Client and the Company.
- For notifications about products and/or services of a Company. A Client must give his/her explicit consent to receive such information.

If the Client is asked to provide Personal Data to comply with legal requirement or to conclude an agreement between the Client and the Company, the Company shall make it evident and advise the Client regarding the purpose of collection of Personal Data.

The purposes for utilising Clients' Personal Data are explicitly mentioned in the Client Agreement.

## Data Protection

The Company will keep Clients' Personal Data for a period of time upon its own discretion. The Company is obliged to put maximum efforts to ensure security of personal data and other confidential information received from its clients, and adhere to rules of internal use of such information.

The Company has the right to share Personal Data to the following categories of recipients:

- *Any Group Company:* we may make Personal Data available to any member of our group, which means any subsidiary company or holding company, and/or any subsidiary company of such holding company (the Group). This may be necessary to provide customers with or administer our products, services, customer and technical support. All of our employees and contractors are required to follow our privacy and security policies when handling personal data.
- *Third party service providers:* We may share Personal Data with our third-party service providers so that they can support our products and services, such as system and platform maintenance services, conducting customer due diligence or credit checks, collecting customer feedback, marketing and advertising services, and data analytics and search engine services. Our third-party service providers are permitted to use Personal Data only for the purpose of providing services to us and may not otherwise share or use your personal information.
- *Fraud prevention and credit reference agencies:* We may share Personal Data with our third-party service providers to conduct anti-money laundering, fraud, sanctions, credit risk and customer due diligence checks, credit reference checks and fraud prevention checks.
- *Introducers and advisers:* We may disclose Personal Data to an introducer if they directed the customer to us.
- *Courts, regulators and law enforcement agencies:* We will share Personal Data when we believe it is required to comply with applicable legal or regulatory obligations and to respond to requests from government authorities, including law enforcement or financial regulators. This may include authorities outside the customers' country of residence.
- *Other third parties:* We may share Personal Data in the event of a merger, sale, restructure, acquisition, joint venture, assignment, transfer or other disposition of all or any portion of our business, assets or stock. If you have questions about or need further information concerning the lawful basis on which we collect and use your personal information.

Personal Data is stored in the servers of the Company in electronic form. When Personal Data is no longer required to be kept, it will be destroyed by using destruction/deletion methods that prevent unauthorised third parties from gaining access to such data during and after destruction/deletion process.

## Cookies

The Company uses Cookies for its website. Cookies are small files which are stored on a user's computer. They are designed to hold a modest amount of data specific to a particular client and website, and can be accessed either by the web server or the

client computer. Cookies may be used on some pages of the Site for us to provide Site users with a more customized web browsing experience.

## Customer Consent and Rights

By accessing the FxPro website and opening an account, you provide your consent to the Company to collect, use, maintain and disclose your personal data in accordance with the above provision of the privacy policy and the Client Agreement.

As a Client you have the following rights:

- To request and obtain a copy of the Personal Data the Company holds about you;
- To request for amendment and/or correction of any incorrect or incomplete data. The Company will be then obliged to fulfil the request (either to complete or amend the data) and notify any relevant third parties who such data was transmitted to;
- To request that the Company stops processing your Personal Data. You therefore acknowledge that refusal from processing your Personal Data may affect the provision of some services of the Company;
- To request to erase Personal Data from the records of the Company. The Company shall fulfil the request, unless there is a lawful reason not to do so;
- To lodge a complaint to the supervisory authority - although we recommend you to first contact us so that we can find a resolution of the complaint to your satisfaction and ensure that reasons for potential future complaints are investigated by us.