



| Privacy Policy



1. Introduction

1.FXLINK Corp or any affiliate of FXLINK Corporation., (referred to herein as “FXLINK Corporation”) may process Client’s personal data to optimize the provision of services and allow access to requested products.

2.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

3.This Privacy Policy applies to all personal data that FXLINK Corporation processes through its website as well as any other affiliated websites and applications. This Policy applies also to personal data collected during the correspondence held with us by any means (email, telephone or otherwise) or any personal information collected during the provision of services

4.This Policy outlines the type of data FXLINK Corporation processes and means of collection, the use/storage of the data, basis for processing and sharing data with third parties, retention period and data privacy rights of the Client.

5.By opening an account with FXLINK Corporation, the Client hereby gives its consent to the collection, processing, storage and use of personal data as explained below.

2. Type of Means of Data Collection

1.FXLINK Corporation 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.

2.The type of personal data FXLINK Corporation may collect, includes among others the name, address, ID/passport, place and date of birth, gender, phone number, email address of the Client, any other data obtained for validation of application or use of services as well as any information collected during the course of the relationship that does not directly relates to the provision of services.

3.The personal data may be collected automatically when the Client visits the website and may include the IP address, device type, identification number, type of browser, geographic location and any other information automatically stored when accessing our database.

4.Data may be also collected if provided voluntarily by the Client when arranging completion of application forms, sending them by post, email or providing information over telephone or email and may include personal details, contact information, financial data or any other data processed as part of the course of business.

3. Use/Storage of Data

1.FXLINK Corporation 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 law.

2.FXLINK Corporation 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 license of the software used and the name of the software manufacturer; the location of the documentation of the software used.

3.Persons engaged in the processing of data shall process data only for authorized 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 the performance of their duties and which are not intended for public use. Such confidentiality requirements continue after termination of the employment or service relationship with FXLINK Corporation.

4.Unauthorized processing of data (including recording, alteration, deletion, reading, copying, (transmission), unauthorized transportation of records and any other unauthorized use of data (not prescribed by official duties) is prohibited.

5.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.

6.Every user of the 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 authorized data processing and the performance of duties of that particular user.

7.FXLINK Corporation shall implement adequate and sufficient measures to ensure that every data processing operation leaves a trace, which would afterward 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.

8.The manager or employee of FXLINK Corporation shall rely on justified expectations that data submitted are correct. The manager or employee of FXLINK Corporation shall, from time to time, verify the accuracy of data in the database(s) by requesting the person submitting data to check the data and, if necessary, make corrections or confirm the accuracy of data.

9.Any incomplete or incorrect data known to the manager or an employee of FXLINK Corporation 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 FXLINK Corporation shall



correct any incorrect data on the data subject in the database if the data subject notifies the manager or employee 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.

10.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.

11.The managers and employees of FXLINK Corporation shall register and preserve the data and documents associated with the provision of services, including:

- a)Documents, which specify the rights and obligations of FXLINK Corporation and the clients, or the conditions of provision of service by FXLINK Corporation to the clients;
- b)Details of provided services and transactions and any communications between the clients and FXLINK Corporation to the extent, which ensures an overview of the actions of FXLINK Corporation in the provision of services.

4.The Basis for Processing Personal Information and Sharing with Third Parties

1.FXLINK Corporation may process personal data in cases where it has the Client's consent to do so, for reason of concluding a contract, to comply with a legal obligation or where such action is in FXLINK Corporation legitimate interest.

2.FXLINK Corporation may share information with affiliates in the event such information is reasonably required by such affiliate in order to provide the products or services to the Client.

3.FXLINK Corporation does not sell, license, lease or otherwise disclose clients' personal information to third parties, except as described in this Privacy Policy.

4.FXLINK Corporation reserves the right to disclose personal information to third parties where required by Law, regulatory and other government authorities.

5.FXLINK Corporation may also disclose information as necessary to credit reporting or collection agencies as reasonably required in order to provide the services to Company and/or its clients.

6.In addition, FXLINK Corporation may engage third parties to help carry out certain internal functions such as account processing, fulfillment, client service, client satisfaction surveys or other data collection activities relevant to its business. Use of the shared information is strictly limited to

the performance of the above and is not permitted for any other purpose.

7.FXLINK Corporation is not responsible for the privacy policies or the content of sites links and has no control of the use or protection of information provided by the clients or collected by those sites. Whenever a client elects to link to a co-branded web site or to a linked web site, the client may

be asked to provide registration or other personal information. Please note that such information is recorded by a third party and will be governed by the privacy policy of that third party.

5. Data Retention

- 1.FXLINK Corporation will retain personal data for as long as it is necessary to carry out the purposes set out in this Policy unless otherwise required by the Law.
- 2.Client agreements and/or conditions of the provision of service by FXLINK Corporation to the clients shall be preserved for at least as long as the contractual or other legal relationship connected to the provision of t services to the client continues unless a longer term is specified by law.
3. The retention of data will be subject to periodic review.

6. Rights of the Data Subject

- 1.The Client shall have the right to withdraw at any time the consent for the processing of personal data, in which case FXLINK Corporation shall cease processing the data to the corresponding extent.
- 2.Every person has the right to access data concerning themselves, to obtain a copy of such data, to rectify any accurate information, collected unless this right is restricted by law. Decisions on granting or withholding authorizations for access to data and issuing copies of data shall be made by the executive manager of FXLINK Corporation.
- 3.Every person has the right to request from FXLINK Corporation to stop processing their data. In such cases, the provision of services and benefit from certain features may not be possible.
- 4.Upon request of the Client, FXLINK Corporation shall notify the data subject of the data, which is available, and the sources of such data, the purpose of data processing and any third parties or categories of third parties that have receive authorization 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 law. The data shall be issued by using the method requested by the data subject, if possible, within five business days from the receipt of the respective request.
- 5.In the cases specified by 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.
- 6.Authorized persons may review, on-site in FXLINK Corporation, the documents on the establishment of databases and any other documents pertaining to the databases.

7. Privacy Policy Updates

FXLINK Corporation may update this Privacy Policy from time to time. In the event FXLINK Corporation materially changes this Policy including how it collects, processes or uses clients' personal information, the revised Privacy Policy will be uploaded in the website. In this respect, the clients hereby agree to accept posting of a revised Privacy Policy electronically on the website as the actual notice of FXLINK Corporation to its clients. Any dispute over the Privacy Policy is subject to this notice and the Client Agreement. FXLINK Corporation encourages its clients to periodically review this Privacy Policy so



that they are always aware of what information FXLINK Corporation collects, how it uses it and to whom it may disclose it, in accordance with the provisions of this Policy.

FXLINK Corporation Limited is authorised and regulated by the National Futures Association (NFA) Register Number: 0538938.

FXLINK Corporation Limited is a company registered in United Kingdom, registered number: 12671959. Registered address: 27, Old Gloucester, LONDON, WC1N 3AX, United Kingdom.