



PRIVACY POLICY

AXITRADER LIMITED (AXI)
BCN 25417 BC 2019

What this Policy is about?

We recognise the importance of your privacy and understand your concerns about the security of your personal information. We are committed to ensuring that when you share information with us or we collect information about those who visit our websites, we do so in accordance with applicable privacy laws.

This Privacy Policy details how we generally collect, hold, use and disclose personal information and your rights in relation to the personal information that we hold about you.

Any reference to 'us', 'our', 'we' or 'Axi' in this Privacy Policy is a reference to AxiTrader Limited (Business Company Number 25417 BC 2019) and the brand names attributed to us as the context requires unless otherwise stated.

Your consent

By providing us with information about yourself through any of our websites, application forms, via telephone or otherwise, you consent to the collection, use, disclosure and transfer of that information as set out in this Privacy Policy. By using our websites you also consent to our use of cookies as set out in this Privacy Policy.

If you apply to open a trading account, your application form (whether written or electronic, or in any other form (including verbal) will constitute your express consent to the use and (in certain circumstances) disclosure of your personal information.

Your use of our online services or your provision of personal information to us constitutes your acceptance of the terms of this Privacy Policy.

The information about you which we collect

The products and services we provide fall under the scope of our registered activities and as such we generally have obligations to ask for a range of personal information from you which could include your name, address, date of birth, gender, contact details, occupation, income, assets and liabilities, bank account details, trading history or statements, financial statements, credit reporting information, employment details, location data or any other similar information which could be used to identify you.

How we collect that information

We obtain most of the information directly from you through application forms or telephone conversations, and from maintaining records of information obtained in the course of ongoing customer service. We may also obtain information from other sources, such as via identity checks.

We may also obtain information about you through your use of our websites, apps or through the use of cookies on our websites.

Sometimes we may ask for other information voluntarily (including through market research, surveys or special offers) so that we can improve our service or better cater to the wider needs of our current and future clients.

We may record communications that we have with you in relation to the services we provide to you and our relationship with you. These recordings may be in electronic format, by telephone, in person or otherwise and will be our sole property, constituting evidence of the communications between us. Such telephone conversations may be recorded without the use of a warning tone or other notice.

If you choose not to provide the information we request, we may not be able to provide you with the product or service you need or open your trading account.

How we use and disclose your information

We use the information you give us to assess your application, conduct identity checks, verify you and do anything else necessary in order to open your trading account. This includes conducting screening checks in accordance with our obligations under relevant anti money laundering laws and other regulatory laws.

Once this process is complete, the information we hold is used for establishing and managing your account, reviewing your ongoing needs, enhancing our customer service and products and giving you information on any opportunities that we believe may be relevant to you.

We may also use your personal information for the future planning of our business, including product development and research. In such instances (and in instances where we have legal or regulatory obligations), and depending upon restrictions on sensitive information, you consent to the disclosure of your personal information where we disclose that information to:

1. relevant regulators or government authority as required, authorised, permitted or compelled by law;
2. other companies within the AxiCorp group (including our associated companies elsewhere in the world) who may be involved in administering your account or providing other services for the AxiCorp group;

3. where applicable, anyone authorised by you (for example, your financial adviser);
4. an introducing broker, referrer, or third-party broker or agent who may have introduced or referred you to us (this is necessary in order to pay fees or commissions for such a referral and can include any click-through links you may have clicked on); and
5. third party service providers, including those who help facilitate or support our business, or develop new software to run our business more efficiently (these could include specialist advisers who have been contracted to provide us with administrative, IT, financial, regulatory, compliance, taxation, insurance, research or other services).

Where we share your personal information in the ways set out above, you acknowledge and understand that this may result in your personal information being sent outside Saint Vincent and the Grenadines. Where this occurs, while we make reasonable attempts to, you acknowledge that we may not be able to extract an undertaking from the overseas recipients that they will comply with privacy laws and the ability to enforce privacy laws or any other contractual privacy obligation in relation to any breach may be very limited. As such, we will not be accountable for any breaches of those laws by that overseas recipient.

Because privacy laws may not apply or be enforceable against some overseas recipients, we understand that you may choose not to disclose your personal information to us. If you choose not to provide the information however, we may not be able to open your trading account or provide you with the product or service you have requested.

The security and storage of your information

We take our obligations to protect your personal information very seriously and as such we take reasonable steps to hold information securely in electronic or physical form.

These steps are supported by several security standards, processes and procedures, and we store information in access-controlled premises or in electronic databases requiring logins and passwords.

The transmission of information via the Internet is not completely secure. We cannot guarantee the security of your data transmitted to our online services and any transmission is at your own risk.

To try to prevent this, we use Transport Layer Security (TLS) encryption technology in order to protect the information that you submit to us. This type of technology is designed to protect you from having your information intercepted by anyone other than us during its transmission. We also use other safeguards such as firewalls, authentication systems (e.g.,

passwords and personal identification numbers) and access control mechanisms to restrict unauthorised access to systems and data.

Once we have received your information, we will take reasonable steps to use procedures and security features to try to prevent unauthorised access, modification or disclosure.

We use a combination of secure computer storage facilities and paper-based files and other records and, irrespective of the format of the information, take steps to protect the personal information we hold from interference, misuse, loss, unauthorised access, modification or unauthorised disclosure.

Some electronic communications through non-secure web platforms may not be secure, virus-free or successfully delivered. If you communicate with us using a non-secure web platform, you assume the risks that such communications between us are intercepted, not received, delayed, corrupted or are received by persons other than the intended recipient.

You can help us to keep your information secure. Remember that any username or password in relation to our websites is personal to you and should not be made available to any other person. You should stop using your username and password and notify us immediately if you suspect that someone else may be using them.

Restrictions on sensitive information

If we collect Taxpayer Identification Numbers (“TINs”), or hold any other sensitive information, that information will be used and disclosed only for the purposes for which it was provided, unless you consent otherwise, or the use or disclosure of this information is allowed by law.

What happens if we make changes to this Policy?

If we change this Privacy Policy we will post the changes on this website, may place notices on other pages of this website, or may include notification of such changes in email communications so that you may at all times be aware of any changes to the information we collect and how we use it. The changes will take effect as soon as they are posted on our websites or you are notified in some other way (whichever occurs first).

Cookies

We use cookies to monitor your use of our websites to observe behaviour, compile aggregate data and provide you with a more effective service.

Cookies are small files containing information that websites all over the world use to track

its visitors. We may set and access cookies on your computer, enabling us to learn which advertisements and promotions bring users to our website. We or any of our affiliates or divisions may use such cookies and the captured data helps us enhance the services offered and to make improvements in relation to the quality of content contained on our websites so that it is more relevant to you.

Direct Marketing

We may use your personal information to offer you products and services that we believe may interest you. We will not do this if you tell us not to. We will not provide your information to non-Group entities for marketing purposes.

If you do not wish to receive marketing offers from us, you can let us know by emailing us at marketing@axi.com.

Hyperlinks

Our websites may contain hyperlinks that link to other sites, and other sites may contain links to our sites. These websites that may be linking to or from our sites may have their own privacy policies. Our Privacy Policy applies exclusively to us and information collected by us. We are not responsible for the privacy policies or the content of the sites you link to, nor do we have control over the use or security of information provided by you or collected by those sites. If you choose to link to one of these websites, you may be asked to supply registration or other information. It is important that you realise this information is going to a third-party. Because of this, you should become familiar with that site's privacy policy and how information you share with that site will be treated.

Accessing Your Personal Information

You may request a copy of the personal information about you which we hold in order to correct any inaccuracies and to object to our using your personal information for a marketing purpose.

To do this, you should contact us using the details set out below in the "How to Contact Us" section. There is no fee for requesting that your personal information is corrected, however in processing your request, our reasonable costs may be recovered if necessary and if relevant legislation allows. This covers such things as locating the information and supplying it to you.

Where we refuse to action your request to correct your personal information, you also have the right to request that a statement be associated with your personal information noting that you disagree with its accuracy.

Updating information about you

If any of the information that you have provided to us changes, for example if you change your email address or if you wish to cancel any request you have made of us, please let us know by contacting us as set out below.

How to Contact Us

If you would like more information about how we manage your personal information or if you wish to change your contact information, please contact us or write to us, at the following contact details:

Privacy Officer

Email: compliance@axi.com

The “Contact Us” page of our Website provides our business addresses and international toll-free telephone numbers for clients from several countries and an international telephone number for clients from other countries.

Our registered address is: AxiTrader Limited, Suite 305, Griffith, Corporate Centre, PO Box 1510, Beachmont, Kingstown, Saint Vincent and the Grenadines.

Concerns about Your Privacy

If you have any concerns about any breach or potential breach of your privacy, please contact our Privacy Officer in writing via email or post at the above address. We will make every effort to resolve your complaint internally and as soon as practicable and in any event within 45 days from receipt of your complaint.

If you are not satisfied with our response, or have a complaint, you may lodge a complaint in accordance with Our dispute resolution process, please contact us or write to us, at the following contact details:

Complaints Officer

Email: service@axi.com

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