



## **Privacy Policy**

At Point Trader, we fully understand how important it is to protect our clients' personal information. This document sets out our Privacy Policy commitment in respect to the information that we hold about our clients and what we do with such information. We recognize that any personal information we collect about the client will only be used for the purposes we have collected it for, or as allowed under the applicable acts of legislation. This Privacy Policy is a unified policy for the investment firms providing services under the Point Trader trademark, belonging to the Point Trader Group.

Point Trader respects the privacy of any user that accesses its websites, therefore, we are committed to taking all reasonable steps in order to safeguard information related to any existing or prospective clients, applicants or visitors. Before submitting any personal data, a person should examine the given terms and should only continue by agreeing with the Terms in the given Privacy Policy with principles set for data transfer, storage and processing.

Point Trader is entitled to unilaterally amend the given principles at any time by notifying the clients no later than 14 days prior to any significant amendments via the Point Trader website, and emails. In issues not regulated by the given Privacy Policy, the parties shall be guided by the General Terms and Conditions of a respective investment firm.

### **How do we use the personal information?**

We may use personal information for the following purposes:

#### **To verify your identity and establish and manage your account:**

As part of providing services, or information about our services, to you, we will need to verify your identity to set you up as a customer and we will need to use those details in order to effectively manage your account with us to ensure that you are getting the best possible service from us. This may include third parties carrying out credit or identity checks on our behalf. It is not only in our legitimate interest to do so but the use of your personal information in this way is necessary for us to know who you are as we have a legal obligation to comply with certain Know Your Customer regulatory obligations.



**To provide you with products and services, or information about our products and services, and to review your ongoing needs:**

Once you open an account with us, or subscribe to an update or webinar, we will need to use your personal information to perform our services and comply with our obligations to you. It is also in our legitimate interests to ensure that we are providing the best products and services so we may periodically review your needs to ensure that you are getting the benefit of the best possible products and services from us.

**To help us improve our products and services, including customer services, and develop and market new products and services**

We may from time to time use personal information provided by you through your use of the services and/or through customer surveys to help us improve our products and services. It is in our legitimate interests for us to use your personal information in this way to ensure that we provide you with the best products and services we can and to continue to be a market leader in our industry.

**To form a profile about you**

We may from time to time use personal information about you to form profiles about you so that we can understand you and provide the very best products and services we can. We may also make decisions about you through automated profiling or automated credit checks which may affect your ability to use our services. We may need to do this either to perform our legal obligations or because it is in our legitimate interest to use your personal information in such a way.

**To investigate or settle enquiries or disputes**

We may need to use personal information collected from you to investigate issues and/or settle disputes with you as it is in our legitimate interests to ensure that issues and/or disputes get investigated and resolved as quickly and efficiently as possible.

**To comply with applicable law, court order, other judicial process, or the requirements of any applicable regulatory authorities**

We may need to use your personal information to comply with applicable law, court order or other judicial process, or the requirements of any applicable regulatory authority. We do this not only to comply with our legal obligations but because it may also be in our legitimate interest to do so.

**To provide references about you**

From time to time, third parties, such as credit agencies may approach us to provide a credit reference about you for credit and identity checks. It may be in our legitimate interest to comply with our legal obligations or we may be obliged to provide such a reference in order to comply with a legal obligation. However if we are unsure we will speak to you first before providing any reference.



### **Data analysis**

Our web pages and e-mails may contain web beacons or pixel tags or any other similar type of data analysis tools which allow us to track receipt of correspondence and to count the number of users that have visited our webpage or opened our correspondence. Where your personal information is completely anonymised, we do not require a legal basis as the information will no longer constitute personal information. However where your personal information is not in an anonymised form, it is in our legitimate interest to continually

evaluate that personal information to ensure that the products and services we provide are relevant to the market.

### **Marketing by us**

We may use your personal information to send you marketing communications by email or phone or other agreed forms (including social media campaigns) to ensure that you are always kept up to date with our latest products and services. Where we send you marketing communications we will either do so as it is in our legitimate interest or with your consent.

### **Internal business purposes and record keeping**

We may need to process your personal information for internal business and research purposes and record keeping purposes. Such processing is in our own legitimate interests and is required in order to comply with our legal obligations. This may include any communications that we have with you in relation to the services we provide to you and our relationship with you. We will also keep records to ensure that you comply with your obligations under any contract you have entered into with us.

### **Rectification**

If the personal information we hold about you is inaccurate or incomplete, you are entitled to have it rectified. If we have shared your personal information with others, we will let them know about the rectification where possible. If you ask us, where possible and lawful to do so, we will also tell you who we have shared your personal information with so that you can contact them directly.

Sincerely ..

**Legal Department**

**POINT FX LTD**