



## PRIVACY AND COOKIE POLICY

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## PRIVACY AND COOKIE POLICY

### Introduction

Leverate Financial Services Limited is a company incorporated under the laws of Cyprus, the registered office of which is at 88 Agias Fylaxeos Street, 4<sup>th</sup> Floor, 3025 Limassol, Cyprus, and is an investment services firm regulated in the conduct of its activities by the Cyprus Securities and Exchange Commission (“**CySEC**”) under license number 160/11 and its activities include, transmission and execution of client orders in financial instruments, including through the use of electronic trading platform.

The Investment Services and Activities and Regulated Markets Law of 2017 (L.87(I)/2017), including all its amendments and the Directives issued by CySEC (the “Regulations”) are the regulatory framework that governs Trading in Financial Instruments.

This policy outlines the Company’s responsibility to manage the protection of privacy and the safekeeping of clients’ personal and financial information. Your privacy is Company’s highest priority and applies to all users of the Company’s website, whether you are former, present or potential client of the Company.

The Company follows different principles in accordance to global protection acts in order to achieve client privacy and data protection. By subscribing to and/or using the Service, the Client expresses his consent to the terms of this Policy. If the Client hereby gives its consent to such collection, processing, storage and use of personal information by the Company as explained below.

In addition, as a recipient of our Service, the Client commits to provide appropriate notice of its privacy practices to, and obtain the necessary permissions and consent from any User whose Personal Information is collected, received, used and/or disclosed (collectively, “Process(ed)”) by the Company.

### Personal Data

The Client’s privacy is important to the Company, therefore the Company shall treat all information collected by, or transmitted to, the Company with care, in particular, personally identifiable information and this Policy describes how, when and why the Company shall collect such information. “Personally identifiable information” (or “Personal Information”) means any information that may be used, either alone or in combination with other information, to personally identify, contact or locate any employee, representative and third party associated with the Client (collectively referred as “User”). Personal information includes, but it is not limited to, first and last name, ID numbers, financial data (including trading data, deposits, withdrawals and credit), email and physical addresses and other contact information. Any information that does not enable identification, location or contacting of the User, such as aggregated information is “Anonymous Information”, and the Company may process “Anonymous Information” in any way it so chooses without prior notice the Client.

With your consent, the Company will collect the necessary personal information required in order for the Company to perform its services offered to clients efficiently. In order for the Company to construct a clients’ profile to assist in providing its services effectively based on the requirements and preferences of the client, the Company may in certain circumstances gather information from third parties, such as banks, credit agencies and/or other sources.

The information collected by the Company during any registration process on the website, shall include required information needed to communicate and verify the identity of its clients, such as, but not limited to, clients’ passport, utility bills and bank statements or company’s incorporation documents, collection of demographic information, including but not limited to occupation, birth date, location etc, financial details in relation to clients’ net worth and estimated annual income and to assess the trading knowledge and experience of its client.

In accordance to the Company's regulatory requirements, all clients' personal information will be required to be kept on record for a minimum period of five (5) years, which will commence on the transmission/execution of a client transaction or the date of which the business relationship between both parties is terminated in accordance to the Company's Terms and Conditions ("Agreement").

### **Usage of Personal Information**

In order for the Company to provide, monitor and improve the quality service and security to its clients, the Company may use the clients' personal information for one or more of the following processes:

- a) Verify the identity of the client
- b) Assess and improve the products and services provided to clients
- c) Transmission/execution of client orders
- d) Company's transmission/execution and post transaction/order services
- e) Assess and improve clients' browsing experience
- f) Inform clients of additional products, services or promotions relevant to its clients

In regards to point (f) above, for any reason should the client not consent to receive information of this nature, the client can inform us accordingly by contacting the Company on the contact details provided by the company on its Terms and Conditions or at the following address: [support@fxpn.eu](mailto:support@fxpn.eu)

In the event that the Company is acquired by, or merged with a third party, or undergoes a change of control, the Company reserves the right to transfer or assign the Personal Information it had collected or received to the transferee or assignee, and such information will become subject to the privacy policy of the transferee or assignee. Should such a sale or transfer occur, the Company will use reasonable efforts to direct the transferee or assignee to use the Personal Information in a manner that is consistent with this Policy.

In the event of our bankruptcy, insolvency, reorganization, receivership or other similar occurrence, the Company may not be able to control how the Personal Information held by us is treated, transferred or used.

### **Protection and Security of Personal Information**

The Company does not sell, license or lease to anyone client's personal information provided to the Company, except as described in this Privacy Policy.

The Company takes reasonable precautions to protect Personal Information from loss, theft, misuse, unauthorized access or disclosure, alteration, or destruction. The Company employ physical, electronic and procedural safeguards to protect Personal Information and it does not store Personal Information for longer than necessary to provide the Service or as permitted by Law.

The Company's data center(s) contains both internal and external servers. Access to the Company's internal server is restricted to pre-approved persons, servers and locations; our external servers can be accessed via the Internet. Any personal information provided by the client to the Company will be strictly protected under enhanced measures of security, protected against loss, misuse, unauthorized access or disclosure, alteration, or destruction, use various security measures to protect your information from unauthorized users and will be treated as confidential and shared only with the Company and its affiliates and not disclosed to any third parties except, and without notice, in accordance to do so under regulatory or legal proceedings, such as:

- a. 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;
- b. Protect and defend the rights or property of the Company's website;
- c. Potential fraud;
- d. Protect the safety of all clients of the Company, all users of the website and/or the public.

Under such circumstances, the Company shall expressly inform the third party regarding the confidential nature of the information. The Company also informs all clients to serve and protect their personal data and advises all clients to maintain confidentiality and not to share with others its usernames and passwords provided by the Company.

### **Affiliates and Parties**

The Company uses a card processing Company-ies for your deposits and withdrawals to and from your trading account. The Company does not retain, share, store, or use any personally identifiable information for any other purposes.

The company and its partners, affiliates and/or associates may share information in a manner that it is useful and relevant only where clients have authorized the Company to do so and in relation to one of the following purposes:

- Reasonably required by such affiliate, partner and/or associate of the Company to provide products and services to its clients;
- To offer additional similar products and services that meet clients' needs

### **Non-affiliated third parties**

The Company may disclose information to non-affiliated third parties where necessary in order to carry out the following internal functions of the Company. All third parties affiliated or non-affiliated, with which the Company shares personal information are required in similar manner of that of the Company and in accordance with all relevant legislation to protect such personal information. The Company will not share personal information with third parties which it considers will not provide its clients with the required level of protection similar to that of its own.

Clients may be introduced to the Company by a Business Introducer; in such cases the Business Introducer may have access to clients' information and clients hereby consent to the sharing of information with such Business Introducer.

### **Contact Clients**

The Company may contact clients by telephone, email or other means of medium for the purpose of offering them further information about the Company's product and services and/or informing clients of unique promotional offerings. By registering and providing agreement to the terms and conditions of the Company client agreement, the clients consent to the receipt of such contact. For regulatory and quality assurance purposes all telephone conversations to and from clients are recorded by the Company.

Any person who wishes not to be contacted further by telephone, email, or other means of medium can inform us accordingly by contacting the Company on the contact details provided by the Company on its Terms and Conditions or at the following address: [dpo@leverate.com](mailto:dpo@leverate.com)

### **Restriction of Responsibility**

The Company's website may be linked to other sites, the Company will not be held responsible or liable for the privacy policies or content of such sites and therefore has no control other the protection and use of information provided by the clients on such sites.

### **Use of "Cookies"**

The Company may use cookies to assess and improve the performance of the website and its products and services offered to its client. Cookies are used by most internet browsers and are small pieces of information which use a unique identification tag and are stored on your device as a result of you using this website or other services we provide to you.

Clients may be able to refuse to have cookies stored on their device by viewing options to change the setting of your browser to refuse all cookies, and/or notify you each time a cookie is sent from their device. By controlling your cookies in this way may impair the quality of service provided by the Company.

## **TERMS AND CONDITIONS FOR THE USE OF THE WEBSITE**

### **Trademarks-Intellectual Property Rights**

Leverate Financial Services Ltd is the owner of the Copyright in the pages and in the screens displaying this website, and in the information and material therein and in their arrangement, unless otherwise indicated. Leverate Financial Services Ltd holds the exclusive rights or license to use or any other license for all kinds of trade names and trademarks contained and/or appearing in this website.

### **Change of Information and Materials**

All information and materials contained in the websites of Leverate Financial Services Ltd, and all terms, conditions, prerequisites and descriptions contained herein, are subject to change without any prior notice.

### **Cookie Disclosure**

Cookies are small text files placed on your computer that are created by the websites you visit or by certain emails you open. Cookies are used to improve your user experience, enable functionality on the website, facilitate site security and provide the business with marketing information about the site's visitors.

Cookie text files comprise both number and letters and are saved into special areas in the memory of your computer or mobile device. Cookies stored here are called session cookies while cookies placed into the hard drive are called persistent cookies.

Leverate Financial Service's cookie disclosure provides the user with information related to the cookies set when you visit a Leverate Financial Service website and how to reject or delete those cookies.

### **How Leverate Financial Services use cookies**

Leverate Financial Services websites use cookies to provide the functionality you need to browse our site correctly. The Company's websites issue cookies upon visiting our websites, unless the user has changed cookie settings in their browser to refuse cookies. Please note that with cookies switched off, many areas of our website and services will not be made available to you. Also, by disabling cookies, the functionality of social bookmarking will not be functional.

Leverate Financial Services does not use cookies to collect personal identifiable information about you. The cookies that we use collect solely anonymous information that is used to optimise our services.

Please note that not all the cookies on our sites are set by us. Please see the section below on third party cookies.

### **What types of cookies do we use**

There are five main types of cookies:

1. **Strictly necessary cookies:** These cookies are essential to enable you to login, navigate around and use the features of our Service, or to provide a service requested by you (such as your username). We do

not need to obtain your consent in order to use these cookies. These cookies can be used for security and integrity reasons; for example, to detect violation of our policies and for support or security features.

2. **Functionality cookies:** These cookies allow our Service to remember choices you make (such as your language) and provide enhanced and personalised features. The information these cookies collect remains anonymous and they cannot track your browsing activity on Third Party websites. For example, these cookies are used for authentication (to remember when you are logged in) and support other features of our Service.
3. **Performance cookies:** These cookies collect information about your online activity (for example the duration of your visit on our Service), including behavioural data and content engagement metrics. These cookies are used for analytics, research and to perform statistics (based on aggregated information).
4. **Targeting cookies or advertising cookies:** These cookies are used to deliver tailored offers and advertisements to you, based on your derived interests. They can also be used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaign. They are usually placed by our advertisers and provide them insights about the people who see and interact with their ads, visit their websites or use their app.

In addition to our own cookies, we may also use various third-parties' cookies to report usage statistics of the Service, deliver advertisements on and through the Service, and so on. Below are the relevant third-party cookies and their respective policies.

1. **3<sup>rd</sup> party "functionality and maintenance cookies":** We use those cookies to complete various tasks, such as to ensure that the same service or offer does not re-appear if it has already been shown and other tasks or for the purposes of detection of bugs and security issues.
2. **AdRoll "targeting cookies or advertising cookies":** These cookies are used to deliver tailored offers and advertisements to you, based on your derived interests. They can also be used to limit the number of times you see an advertisement as well as help measure the effectiveness of the advertising campaign. They are usually placed by our advertisers and provide them insights about the people who see and interact with their ads, visit their websites or use their app.
3. **Google Analytics "performance cookie":** This cookie is used to collect information about how visitors use our website and services. We use the information to compile reports and to help us improve our Service. The cookies collect information in an anonymous form, including the number of visitors to our website and services, where visitors have come to our website and the pages they visited. We encourage you to review Google Analytics privacy and cookie policy.

### **How can you manage the installation of Cookies?**

You can control and/or delete cookies as you wish directly from within your own browser and prevent, for example, third parties from installing them. You can delete all cookies that are already on your computer and you can set most browsers to prevent them from being placed. If you do this, however, you may have to manually adjust some preferences every time you visit a site and some services and functionalities may not work. It is important to note that by disabling all Cookies, the functioning of this site may be compromised.

### **Changes to this Cookies Policy**

The Company reserves the right to make changes to this Cookies Policy at any time by giving publicity to the Users on this website. Therefore, please check this page often, by reference to the date of last modification indicated at the bottom. In case of rejection of the changes made to this privacy, the user is required to end the use of this website and any applications. Unless otherwise specified, the privacy policy will continue to apply to personal information collected until then.

### **Updates**

The Company has the right to amend the current Policy at its discretion and at any time it considers is suitable and appropriate; the Company shall review and amend the current policy at least on an annual basis. The Policy is available for review by clients upon request and it is uploaded on the Company's website.

If there is anything in this Policy that you may not understand or have further queries, contact us at [support@fxpn.eu](mailto:support@fxpn.eu).