

INFINOX Capital Ltd

PRIVACY AND SECURITY POLICY



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INFINOX Capital Ltd
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INFINOX PRIVACY AND SECURITY POLICY

INFINOX Capital Ltd (“INFINOX”) is a global broker regulated by the Financial Conduct Authority (FCA) headquartered in London. We help traders and Introducing Brokers achieve their business goals and personal ambitions. Our business is built on integrity and trust, offering an industry leading combination of dynamic products, competitive trading parameters and premium, one-on-one service.

It is INFINOX’s mission to enable the personal ambitions and business goals of FOREX traders and IBs, through underpinning dynamic products with competitive trading parameters and a premium customer experience.

1. OUR COMMITMENT

INFINOX is committed to protect the privacy of your personal and financial information obtained to enable us to provide you with a secure website for you transactions. This policy confirms details how we manage the information provided to us by your or a third party in connection with our provision of services to you or which we collect from your use of our services via our website(s) and app(s). INFINOX will use your personal information in accordance with this Privacy and Security Policy and otherwise in accordance with United Kingdom data protection legislation(s).

2. WHY DOES INFINOX COLLECT PERSONAL INFORMATION?

INFINOX collects certain personal information in order that it may meet the needs of its customers. By collecting certain personal information, INFINOX is able to monitor and improve the services which it offers to its existing and potential customers.

We will use this information for the following purposes:

- verifying your identity,
- assessing the appropriateness of the products and services we provide,
- establishing and maintaining your account,
- providing our services to you,
- improving our services,
- regulatory notifications and
- marketing.

3. WHAT INFORMATION DOES INFINOX OBTAIN FROM YOU?

INFINOX will collect and hold information about you when you complete an online application or other type of form or access and trade on your account through this website or another service we provide to you. The kind of personal information you give us may include (but is not limited to) name, address, date of birth, passport number, tax identification number, email address telephone number,



employment and income information, credit/debit card information, transaction history and financial statements.

INFINOX may derive information from your use of this website or another service we provide to you and may store this information with your personal profile. This information may include site areas visited, pages viewed, frequency and duration of visits, types of transactions conducted, documents downloaded and other websites which may have referred you or to which you link.

4. HOW WILL INFINOX USE THIS INFORMATION?

INFINOX may use such information for any one or more of the following purposes:

- 1** to provide the services to you that you have requested including processing transactions;
- 2** to confirm your identity;
- 3** to maintain your personal profile;
- 4** to manage your account;
- 5** to contact you when necessary or appropriate in relation to the services being provided to you;
- 6** to keep you updated whilst you are a customer in relation to matters such as contracts you have traded and activities of INFINOX;
- 7** to manage and administer the products and services provided to you;
- 8** to provide you with information regarding the products and services offered by INFINOX;
- 9** to develop an understanding of the products and services that you may be interested in obtaining from INFINOX;
- 10** to provide you with information or opportunities that we believe may be relevant to you;
- 11** to tailor the website or other service we provide to you to your needs and interests; and
- 12** to create anonymised statistical data.

You consent to INFINOX using your personal information for the above-stated purposes.

You acknowledge and agree that your personal information may be transferred within or outside the European Economic Area (EEA). You agree that we will be permitted, if so required, to furnish relevant information concerning or your Trading Account(s) to any person who we believe to be seeking a reference or credit reference in good faith. The information we share may affect your ability to obtain



credit. Please note that INFINOX only transfers personal information to organisations outside the EEA if INFINOX has assessed the organisation as having appropriate controls and safeguards in place to protect your personal data.

5. WHO MAY INFINOX DISCLOSE THIS INFORMATION TO?

INFINOX does not sell, license or otherwise disclose your personal information to third parties for marketing purposes. INFINOX may be required to provide your personal information to the Financial Conduct Authority and other regulatory and government bodies from time to time in the UK and other countries. INFINOX may also disclose your personal information to:

- 1** financial institutions and other similar organisations that it deals with in the course of its corporate activities, or those that are nominated by you;
- 2** external service providers and professional advisers (which may be located overseas) that provide services to INFINOX;
- 3** any organisation at your request or any persons acting on your behalf, including your financial adviser, broker, solicitor or accountant;
- 4** any third parties where this is necessary to process a transaction or provide services which you have requested; or any authority to whom INFINOX is required to disclose such information by law.

In the event that INFINOX is (a) subject to negotiations for the sale of its business (whole or party of), or (b) sold to a third party or undergo a re-organisation, you agree that any of your personal information which we hold may be disclosed to such party or its advisors as part of any due diligence process for the purpose of analysing any proposed sale or re-organisation or transferred to that re-organised entity or third party and used for the same purposes as you have agreed to under this Agreement.

6. UPDATING YOUR INFORMATION

You may inform INFINOX at any time that your personal details have changed or that you wish INFINOX to delete personal information we hold about you by emailing us at accounts@infinox.com. INFINOX will change or delete your personal information in accordance with your instructions, except to the extent that we are required to hold your personal information for regulatory or legal purposes, to provide you with the services you have requested or to maintain adequate business records.



7. ACCESSING YOUR INFORMATION

Under the UK data protection legislation, you have, subject to certain exceptions, the right to obtain copies of any personal information which INFINOX holds about you (SAR – Subject Access Form) and to inform INFINOX of any inaccuracy.

If you wish to access any personal information we may hold or wish us to correct any misinformation please notify us in writing. A fee may be charged for providing access to the information to cover the cost of verifying the application and locating, retrieving, reviewing and copying any material requested.

Please note that pursuant to the Data Protection Act 1998 or the General Data Protection Regulation 670/2016 (when it enters into force) or any other applicable laws and regulations certain information may be exempt from disclosure or we may be unable to disclose information you request.

8. LINKS

When you use this website or other service we provide to you, you may be able to link to other websites. This Privacy and Security Policy does not apply to those sites. INFINOX encourages you to read the privacy policies on such sites.

9. COOKIES

INFINOX uses cookies to gather information about your access to this website and other services we provide to you. Cookies 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 service we provide to you.

When cookies are used by us, they collect statistical and factual information about how you use our services. Most internet browsers are set up to accept cookies. If you do not wish to receive cookies, you may be able to change the settings of your browser to refuse all cookies or to have your computer notify you each time a cookie is sent to it, and thereby give yourself the choice whether to accept it or not. However, this may impair the quality of the services that we provide to you in relation to your account.

10. SECURITY

INFINOX takes security very seriously and adopts industry and information security best practices to protect your personal information and ensure it is not accessed by unauthorised persons.

Measures include encryption of data during transmission, strong authentication mechanisms and secure access to machines and data.



11. WHAT ARE YOUR RIGHTS?

You are not required to provide any personal information requested by INFINOX. However, without that information, INFINOX may be unable to open an account for you, where the information is requested in an application form, or to provide you with any other services, information or assistance you have sought.

We may charge a nominal fee to cover the cost of verifying the application and locating, retrieving, reviewing and copying any material requested.

Should you have any questions or complaints about your privacy please contact us. If your complaint is not resolved by INFINOX to your satisfaction, you may complain to the Information Commissioner.

12. YOUR CONSENT

Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. By accessing this website or other service we provide to you, you consent to INFINOX collecting, maintaining, using and disclosing personal information about you and provided by you or by another person as described above.

13. AMENDMENTS TO POLICY

INFINOX may make changes to this Privacy and Security Policy from time to time for any reason and will notify you of such changes by posting an updated version of this policy on this website or where appropriate, by email.

You are responsible for regularly reviewing this Privacy and Security Policy and if you use this website or other service we provide to you after any changes are published, any such use shall constitute your agreement to those changes.

