



# PRIVACY POLICY

## Privacy Policy

We, FVP Trade together with our subsidiaries and affiliates respect the privacy of individuals with regard to personal data and are committed to protecting the privacy of our users/subscribers/customers (collectively, “Users”), and strive to provide a safe and secure user experience. This Privacy Policy is formulated in accordance with the Personal Data Protection Act 2018 (“Act”), which describes how your information (“**Personal Data**”) is collected and used and your choices with respect to your Personal Data.

In this Policy, we use the terms “we” “us” “our” or “**FVP Trade**” to refer to FVP Trade Limited and its related companies.

Personal information is any information or opinion about you that is capable (or reasonably capable) of identifying you, whether the information or opinion is true or not, and regardless of whether the information is recorded in a material form.

Sensitive information includes things like your racial or ethnic origin, political opinions or membership of political associations, religious or philosophical beliefs, membership of a professional or trade association or trade union, sexual orientation or criminal record. Your health, genetic and biometric information and biometric templates are also sensitive information. Sensitive information is also personal information for the purposes of the Privacy Act.

We collect personal and/or sensitive information to provide you with the products and services that you ask for, as well as information about products and services offered by us or third parties.

We may use your personal and/or sensitive information to administer our products and services, for prudential and risk management purposes and, unless you tell us otherwise, to provide you with related marketing information. We also use the information we hold to help detect and prevent illegal activity. We cooperate with police and other enforcement bodies as required by law.

We disclose relevant personal information to external organisations that help us provide services. These organisations are bound by confidentiality arrangements. They may include overseas organisations.

You can seek access to the personal information we hold about you. If the information we hold about you is inaccurate, incomplete, or outdated, please let us know so that we can correct it. If we deny access to your personal information, we’ll let you know the reason why. For example, we may give an explanation of a commercially sensitive decision, or give you access to the information through a mutually agreed intermediary, rather than provide you with direct access to evaluative information connected with the decision.

### **What Information Are We Collecting and How Are We Collecting It?**

We will collect and process the following personal information about you:

- **Information you provide to us**

You provide us with personal information by filling in the application or other forms on our website or the FVP Trade platform, by accessing and trading on your account through our platform or by corresponding with us by phone, email or otherwise. The information you provide us may

include your name, address, contact details, financial information about your income and wealth, professional and employment details, trading history and other personal information.

- **Information we collect about you**

We will also collect information about you through your use of this website and our platform. This information may include site areas visited, pages viewed, frequency and duration of visits.

- **Information we receive from other sources**

We may also collect your personal information from third parties, including, for example, business partners, analytics providers, search information providers, credit reference agencies and third-party marketing companies or through publicly available sources.

## **Why We Collect Your Personal Information**

We only collect personal information when it's reasonably necessary for us to do business with you. By collecting your information, FVP Trade is able to monitor and improve the services we offer to our existing and potential clients.

We use your personal information to:

- verify your identity;
- provide you with the products and services that you've asked for;
- help us monitor, evaluate and develop our products and services;
- enable secure access to our client area;
- unless you tell us otherwise, keep you informed about our products and services and those of our relevant business and initiative partners, and tailor this information to your needs and interests;
- provide you with information regarding the products and services offered by FVP Trade;
- provide you with information or opportunities that we believe may be relevant to you;
- tailor the website or other service we provide to you to your needs and interests;
- respond to any feedback, queries or complaints;
- provide you with technical support;
- participate in any third party acquisition or potential acquisition of an interest in us or our assets;
- comply with our legal obligations under the applicable laws; and
- take measures to detect and prevent fraud, crime or other activity which may cause harm to our business or our products and services.

## **Incomplete or Inaccurate Information**

If you provide us with incomplete or inaccurate information, we may not be able to provide you with the products or services that you ask for.

## **Who May We Disclose Your Information To**

- **Internal concerned parties**

We share your information with companies in our group, as well as our employees, in order to provide you with our services.

- **Business partners**

We share your information with business partners, such as storage and analytics providers and advertisers, who help us provide you with our service. These third parties may have access to your Personal Data so that they may perform these tasks on our behalf, but they are obligated to comply with this Privacy Policy and may not use your Personal Data for any other purpose. We may also share your personal data with business partners such as marketers whom we believe can offer you relevant or complementary products and services. You may object to the transfer of your personal data to such business partners at any time, or unsubscribe from their communications, as detailed in the “Marketing and advertising” section above.

- **Compliance with laws and law enforcement entities**

We cooperate with government and law enforcement officials and private parties to enforce and comply with the law. We will disclose any data about you to government or law enforcement officials or private parties as we, in our sole discretion, believe necessary or appropriate to respond to claims and legal process (including but not limited to subpoenas), to protect our or a third party’s property and rights, to protect the safety of the public or any person, or to prevent or stop any activity we may consider to be, or to pose a risk of being, illegal, unethical, inappropriate or legally actionable. We also may be required to disclose an individual’s Personal Data in response to a lawful request by public authorities, including meeting national security or law enforcement requirements.

- **Merger and acquisitions**

We may share your data if we enter into a business transaction such as a merger, acquisition, reorganization, bankruptcy, or sale of some or all of our assets. Any party that acquires our assets as part of such a transaction may continue to use your data in accordance with the terms of this Privacy Policy.

## **How We Protect Your Information**

FVP Trade is committed to protecting the privacy of all personal information that FVP Trade obtains from you.

We strive to take appropriate security measures to help safeguard your personal data from unauthorised access and disclosure. For example, only authorised employees are allowed to access personal data, and they may only access it for permitted business functions. We also use technology to protect your information, including encrypting sensitive personal data that is transferred to or from our systems and using firewalls to help prevent unauthorised persons from accessing information. If you have an online account with us, your account is also protected by a password for your privacy and security, and you must prevent unauthorised access to your account and personal data by selecting and protecting your password appropriately, limiting access to your devices, and by signing off after you have finished accessing your account.

While we cannot guarantee that loss, misuse, or alteration of information will never occur, we use reasonable efforts to prevent it. Please keep in mind that no method of storage or transmission over the Internet is completely secure, so your use of our products and services and provision of information to us is at your own risk.

Please be aware that our websites may contain links to other sites on the Internet that are owned and operated by third parties. The information practices of those websites linked to our websites are not covered by this Privacy Policy. We are not responsible for the privacy policies of websites to which our website links. If you provide any information to such third parties, different rules regarding the collection

and use of your personal data may apply. We strongly suggest you review such third party's privacy policies before providing any data to them.

## **Direct Marketing**

We may use your Personal Data in the following ways: we or our partners may send you promotional material concerning our Service, or our partners' services, which we or our partners, believe might interest you; we may also display certain adverts on our Service, which we believe will be relevant for you. We make our best efforts to make sure you see only relevant ads and receive relevant communications from us, including but not limited to, by building an automated profile based on your Personal Data.

You may choose not to receive our promotional or marketing emails by clicking on the "unsubscribe" link in the emails that you receive from us. Please note that even if you unsubscribe, we may continue to send you service-related updates and notifications, or reply to your queries and feedback you provide us. You may also object to the use of your Personal Data for advertising purposes by disabling your cookies, as described in the Tracking Technologies section above. Please note we have no control over our partners' communications, in order to unsubscribe from our partners' communications please contact the relevant partner, or use the "unsubscribe" link in its emails.

## **Retention**

We will retain your Personal Data for as long as necessary to provide our services, and as necessary to comply with our legal obligations, resolve disputes, and enforce our policies. Retention periods will be determined to take into account the type of information that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable time. Under applicable regulations, we will keep records containing client personal data, trading information, account opening documents, communications and anything else as required by applicable laws and regulations.

## **Use of Cookie**

Cookies help us provide you with a better website by enabling us to monitor the pages that you find useful and tailor our website to your needs, likes and dislikes by gathering and remembering information about your preferences.

We may collect information about your computer, including where available your IP address, operating system and browser type, for system administration. This is statistical data about your browsing actions and patterns, and doesn't identify you or anyone else as an individual.

You can control cookies by changing the settings in the web browser on your computer or tablet and mobile. To manage the functionality of cookies on your mobile phone, please refer to your handset manufacturer or mobile browser guide.

For detailed information on the cookies we use and the purposes for which we use them see our [Cookie Policy](#).

## **Changes to Our Privacy Policy**

This Privacy Policy is subject to changes from time to time, at our sole discretion. When such a change is made, we will post a revised version online. Changes will be effective from the point at which they are posted. It is your responsibility to review this Privacy Policy periodically so you are aware of any changes. By using our services, you agree to this Privacy Policy.

## **Contact Us**

For questions regarding this Privacy Policy or if you have a privacy concern or questions about how your personal data is used, please contact us at [support@fvptrade.com](mailto:support@fvptrade.com).