

Privacy Policy

1. Introduction

Your privacy is of utmost importance to us and it is our policy to safeguard and respect the confidentiality of information and the privacy of individuals. The following Privacy Policy sets out how SmartFX collects, uses and manages your personal information we receive by you or a third party in connection with our provision of services to you or which we collect from your use of our services and/or our website (i.e., www.smartfx.com) and/or any other related websites and applications including, among others, the Client Portal (www.my.smartfx.com). This Privacy Policy also informs you of your rights with respect to the processing of your personal information.

By using SmartFX websites, you give your consent to the collection and use of personal information by SmartFX as explained in this Privacy Policy.

2. Data Collection

As part of our daily business operations, we need to collect personal information from our clients and prospective clients in order to provide them with our products and services.

When you register for either a demo or a live account with SmartFX, we collect your personal information directly from you and indirectly as a result of your relationship with us. By understanding your financial needs, we can treat you fairly as a client; we can provide you with the most suitable products and services, give you the appropriate information on investment strategies, process your requests and transactions and offer you both sales and post-sales services.

We request the following Personal Data from you:

- Personal and financial information needed during the online registration applications/forms;
- Documents needed for KYC and AML procedures as proof of your identity and residency such as Passport, National ID, utility bills, bank or credit card statements;
- Set of corporate documents in case of corporate clients.

Please note that if you decide to end the business relationship with SmartFX, we must keep your Personal Data on record for the next five years.

3. Use of your Personal Data.

SmartFX shall use your Personal Data for next purposes:

- To verify your identity.
- To ensure that you meet the suitability requirements needed to use our products and services.
- To manage the account you have with us.
- To process your transactions from and to payment service providers (PSPs) and/or banking institutions.
- To process your trading orders.
- To send you information about transaction/post-transaction services.

- To keep you updated with news on our products, services and any other information relevant to your business relations with SmartFX.
- For website improvement purposes.
- For the analysis of statistical data which will help us provide you with better products and services in the future.

4. Cookies

Cookies are small text files sent from Web servers that may be stored on your computer. They used to track website visitors. We use cookies and web beacons (also known as action tags or single-pixel gifs), and other technologies (collectively, "cookies") to provide us with data we can use to improve your experience with us and to know you better. Cookies enable us to capture how you arrived at our site, when you return, which pages on our site you visit, and to recognize that you are already logged on when we receive a page request from your browser.

We will never share this information with any 3rd party. Cookies are readable only by us and do not contain any personal information nor do they contain account or password information.

SmartFX may set and access SmartFX's cookies on your computer, enabling us to learn which advertisements and promotions bring our visitors or prospective clients to our website. SmartFX or any of its departments may use cookies in connection with SmartFX's products and services to track your activities on our websites. Such information that we collect and share would be anonymous and not personally identifiable. SmartFX may share usage information about visitors to our websites with reputable advertising companies for the purpose of targeting our Internet banner or video advertisements.

All web browsers have settings that allow you to block cookies. By visiting our website with your browser set to allow cookies, you consent to our use of cookies as described above. If you choose to block cookies you may use our services but some functions may not work as designed.

5. The security of your personal information

SmartFX is committed to safeguarding your Personal Data by adhering to strict security standards and using the most up to date security technologies.

When you open an account with us, you are issued a unique account number, User ID and a password. Only a limited number of SmartFX employees who have a need to know this information will have access to your account number, User ID, and password. However, please remember that you are ultimately responsible for maintaining the secrecy of your account number, User ID and password. We strongly recommend that you do not disclose this information to anyone.

We use proper SSL certificates to authenticate our websites and secure trading and customer-facing applications, allowing you to verify that you are connected to our websites.

6. Disclosure of your Personal Information

SmartFX shall not disclose any of its clients' confidential information to a third party, except:

- to extent that it is required to do so pursuant to any applicable laws, rules and/or regulations;

- if there is a duty to the public to disclose;
- if our legitimate business interests require disclosure; or
- at your request or with your consent or to Persons described in this policy.

SmartFX will endeavor to make such disclosures on a 'need-to-know' basis, unless otherwise instructed by a regulatory authority. Under such circumstances, SmartFX will notify the third party regarding the confidential nature of any such information.

7. Your Privacy Rights

You have certain rights in relation to your Personal Information. You can access your Personal Information and confirm that it remains correct and up-to-date, request its deletion or choose whether or not you wish to receive material from us or some of our partners by logging into your Client Portal and submitting a ticket accordingly.

You are entitled to receive personal information free of charge except in the following circumstances where we may charge a reasonable fee to cover our administrative costs of providing the personal information for:

- manifestly unfounded or excessive/repeated requests, or
- further copies of the same information.

Alternatively, we may be entitled to refuse to act on the request. Please consider your request responsibly before submitting it. We'll respond as soon as we can. Generally, within 1 week of time.

Please keep in mind that there will be residual information that will remain within our databases, access logs and other records, which may or may not contain your Personal Information. Please also note that certain Personal Information may be exempt from such requests in certain circumstances, which may include if we need to keep processing your Personal Information to comply with a legal obligation. The various rights are not absolute and are subject to certain exceptions or qualifications.

In order to exercise any of the rights described below please contact us at support@smartfx.com.

8. Modifications

SmartFX reserves the right to update or modify this Privacy Policy at any time, without notice, by posting such modifications on this web page. Such modifications will be effective upon posting. You are deemed to consent to such modifications by further using the services after such modification.

9. Legal Disclaimer

We reserve the right to disclose your personal information as required by law and when we believe that disclosure is necessary to protect our rights and/or to comply with a judicial proceeding, court order, or legal process served on our Website. We will not be liable for misuse or loss of personal information resulting from cookies on our website that we don't have access to or control over. We will not be liable for unlawful or unauthorized use of your personal information due to misuse or misplacement of your passwords, negligent or malicious, however contacted.