

PRIVACY POLICY

EMAIL CONTACT ADDRESS: SUPPORT@CSLFIRM.NET

We strive to protect your privacy and ensure the security of any personal information that we receive from you.

WHAT IS THE PURPOSE OF THIS POLICY?

The purpose of this policy is to explain what personal information we collect and how we and our subsidiaries may use it. Companies are affiliated with us if they are our subsidiaries or if both we and they are subsidiaries of the same legal entity.

We are the controller of any personal information that you provide to us, which means that we determine the purposes and means of processing that personal information.

HOW DO WE OBTAIN AND STORE YOUR PERSONAL INFORMATION?

We obtain your personal information through applications, emails, letters, phone calls, text messages, cookies and conversations when you register for and use our services (including personal information obtained through the use of our training tools, demo accounts and trading simulators).

We may monitor or record telephone conversations with you, as well as monitor (and keep records of) all emails and electronic messages that we send or receive.

We follow strict security procedures when storing and disclosing the personal information you have provided to us in order to prevent unauthorized access.

WHAT TYPES OF PERSONAL INFORMATION DO WE COLLECT AND PROCESS?

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We may process the following types of personal information:

- name
- contact details, including email address and phone numbers
- age or date of birth
- gender
- occupation
- income
- trading knowledge and experience
- information related to your trading account, including your account history, activity and orders
- IP address
- National Insurance number
- transaction report reference
- power of attorney / agent details
- phone device type
- Operating System
- device identifier
- cookie identifier
- Google 360 ID
- GUID



information about your use of our services, products and features (including information obtained through the use of our training tools, demo accounts and trading simulators)

- bank account number
- sort code
- passport number
- marital status
- usage data

HOW DO WE VERIFY YOUR IDENTITY?

In order to comply with anti-money laundering regulations, we are required to verify the names and addresses of our clients and certain third parties. We may ask you to provide physical forms of proof of identity when opening an account. Alternatively, we may use a credit reference agency to verify your identity. Lenders do not see or use our search to assess your ability to obtain credit. Our search is conducted using all necessary security measures to ensure that the personal information we receive is strictly confidential and cannot be accessed by unauthorized persons.

HOW DO WE USE YOUR PERSONAL INFORMATION?

In addition to verifying your identity, the personal information that we hold may be used to:

- consider any application you submit
- carry out risk assessments
- comply with our legal and regulatory obligations
- perform our obligations under any contract that we have entered into with you
- manage our relationship with you, including resolving issues or concerns
- create and manage your account
- analyze your current needs
- provide you with information, products and services that you request from us
- verify your instructions to us
- investigate any complaint that you may submit
- provide evidence in any dispute or alleged dispute between you and us
- collect amounts due
- train our staff
- improve customer service and products
- carry out product development and analysis
- detect or prevent fraud or other crimes
- analytics, including through the following services of Google Inc. and Facebook Inc.:
 - contacting you — we may from time to time send you marketing materials by post, email, telephone, SMS, mobile push notifications, web push notifications, messengers (Viber, Telegram, Facebook Messenger and others) or other electronic messaging services
- processing payments, including through the following service providers

WHEN MAY WE SHARE YOUR PERSONAL INFORMATION?

We may share your personal information with:

- the relevant regulatory or tax authority
- such third parties as we reasonably consider necessary for the prevention of crime, such as the police
- our affiliated companies
- third-party service providers and advisers who provide us with administrative, financial, research or other services in connection with the services we provide to you
- our introducing brokers and other commercial partners
- our professional advisers
- our auditors for the purposes of carrying out financial and regulatory audits
- our agents, including credit reference agencies, acting on our behalf and carrying out such creditworthiness and identity checks, including anti-money laundering checks, regulatory compliance reporting and fraud prevention checks
- courts, tribunals, regulatory or tax authorities and government agencies so that we may enforce our agreement with you or comply with the requirements of a court, regulatory authority, tax authority or government body
- our trade repository
- other parties whose involvement may be required to provide you, as our client, with the best possible service

As a general rule, we require organizations outside our group of subsidiaries to whom we disclose your personal information to acknowledge the confidentiality of your data, undertake to respect your right to privacy and comply with data protection principles and this policy.



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HOW MAY WE SHARE YOUR PERSONAL INFORMATION?

The information we may collect is anonymous and will help us further improve your user experience with our mobile application.

We may collect information and use third-party services to understand how you interact with our application, review errors and crashes, provide customer support, and even expand or improve your in-app access experience.

This information will be of significant benefit to you.

In order to provide these benefits, we may sometimes need to collect and share anonymous data, such as information about features used within the application, what users click or swipe on, which screenshots are taken, and to identify the virtual device.

Please be assured that none of the anonymous data we may collect includes personal or financial information, other sensitive data or user-generated personal content. In addition, any data we may share will not include camera data, microphone data from your device or other user data. All transmitted data is protected by SSL encryption.

WHAT IS THE LEGAL BASIS FOR OUR PROCESSING OF PERSONAL INFORMATION?

The legal basis for our processing of personal information will depend on why we are processing your personal information.

If you wish to enter into or have entered into a contract to receive services from us, we will process your personal information so that we can enter into and perform our contract with you. If you do not provide the requested personal information, we may not be able to provide you with some or all of these services.

We may also need to process your personal information in order to comply with our legal and regulatory obligations, including in relation to anti-money laundering, counter-terrorism and sanctions checks, as well as complaints, investigations or legal proceedings.

We also have a legitimate interest in processing your personal information in order to:

- provide services or supply products or information that you have agreed to receive from us
- ongoing management of our relationship with you and maintaining contact with you
- our internal business purposes, which may include business recovery and disaster recovery, document retention/storage, IT service continuity (such as backups and helpdesk support), in order to ensure the quality of the services we provide to you
- corporate transactions
- marketing analytics, including the optimization of marketing campaigns and web analytics that enable us to design and target our products and services
- updating our records and learning how clients use our products/services
- developing our products and services, growing our business and informing our marketing strategy
- identifying types of clients for our products and services and keeping our website(s) and platform(s) relevant and up to date
- portfolio analysis and experience review so that we can improve the products and services we offer to clients

In any case, we will be happy to help clarify the specific legal basis applicable to the processing and, in particular, whether the provision of Personal Information is a statutory or contractual requirement or a requirement necessary to enter into a contract.

WHAT IS THE PLACE OF PROCESSING?

The data is processed at our operating offices and in any other places where the parties involved in the processing are located.

Depending on your location, data transfers may involve transferring your personal information to a country other than your own. You can find more information about the location of processing of such transferred personal information in the section "Use of Your Personal Information".

Please note that we use Transport Layer Security (TLS) encryption (also known as HTTPS) for all transmitted data. All data is transmitted over an encrypted TLS 1.2 connection.

HOW LONG WILL WE RETAIN IT?

We retain personal information about you in electronic and/or paper files while you are a client and for at least three years after you cease to be a client. Please note that under applicable anti-money laundering and counter-terrorist financing legislation, some of your personal information must be retained for seven years. Such personal information includes:

- first name, last name, patronymic (if applicable)



- residential address
- age / date of birth
- passport details
- photographs of identity documents
- information about deposits to and withdrawals from your account, the currency and amounts of such deposits and withdrawals
- information about your trading activity
- phone number
- email address
- history of communications with customer support (chats / emails / calls)

In addition, the above data will be retained for our protection against legal claims for the duration of the limitation periods provided for by applicable law.

Please note that the above personal information will be encrypted and securely stored in our IT system, will not be used for any purposes other than those stated above, and will be deleted from our system after the seven-year period expires. Please be assured that access to the above personal information will be restricted throughout the retention period.

WHAT IS A COOKIE AND WHY DO WE USE IT?

Cookies are small pieces of information that are stored on your computer by a website that you visit so that you can perform certain functions on the website and tailor its content to your preferences. They may store data on pages for which you have provided key information (for example, when you provide a password), but only after you are prompted and consent to the storage of such information. Cookies may be used on certain pages of the website so that we can provide you with a more personalized web browsing experience. They are not used to identify individuals who simply visit the website.

Types of cookies that we use:

- **SESSION COOKIES**

These cookies are temporary as they are deleted as soon as you close your browser. Session cookies are used to retain information that you provide to us while navigating through each section of our website. You may refuse session cookies through your browser's privacy settings, but please note that doing so may negatively affect your browsing experience, especially if they are declined on all websites.

- **ANALYTICAL COOKIES**

Analytical cookies may include both temporary and more persistent cookies that we use to track how you use our website and for how long. Analytical cookies do not disclose any identifying information relating to your identity, but help us improve the delivery of our content to you. To learn how to opt out of analytical cookies, please refer to your browser's privacy settings.

- **FUNCTIONAL COOKIES**

Functional cookies record and store your choices in order to provide a more convenient experience when using our website. One way functional cookies do this is by remembering the language you selected each time you visit us. Please refer to your browser's privacy settings to learn how to opt out of functional cookies.

- **THIRD-PARTY COOKIES**

These cookies are used by third parties, primarily social networking websites such as Google+, Facebook or YouTube. Third-party cookies allow us to offer you easy ways to share our content on social networks, as well as to display videos that we publish on YouTube. You can disable the use of these cookies through your browser's privacy settings, but please note that doing so will also disable all of the features described above.

As mentioned above, we use cookies to ensure optimal functionality of our website and to tailor our content to your personal preferences.

HOW CAN YOU GET FURTHER ASSISTANCE?

If you need assistance with our Privacy Policy or have any questions about it, please contact us. You can find our contact details on the website.

If you are dissatisfied with any aspect of how we collect, share or use your personal information, we would like you to let us know. You may contact us using the contact details above.

WHAT ARE YOUR PRIVACY RIGHTS?

This section explains your rights in relation to your personal information in more detail.

Access to your personal information



WHEN CAN YOU REQUEST ACCESS?

You have the right to:

- obtain confirmation as to whether your personal information is being processed
- obtain access to your personal information

You may request copies of paper and electronic records about you that we hold, share or use. In order to process your request, we may require proof of identity and sufficient personal information so that we can locate the personal information you are requesting.

WHEN WILL ACCESS NOT BE PROVIDED?

We can only provide you with your personal information and not the personal information of another individual. In addition, if access would adversely affect the rights of another person, we are not required to provide it. Due to legal privilege, we will not be able to show you anything that we learned in connection with a claim or legal proceedings.

Please clearly specify in your access request the personal information you are requesting. If this is unclear, we may come back to you and request additional personal information for clarification.

Correction of your personal information.

HOW CAN YOU CORRECT YOUR PERSONAL INFORMATION?

You have the right to obtain from us, without undue delay, the rectification of inaccurate personal information concerning you. If you inform us that the personal information we hold about you is inaccurate, we will verify it and, if we agree with you, correct our records. If we do not agree with you, we will inform you accordingly. If you wish, you may inform us in writing that you believe our records remain inaccurate, and we will include your statement whenever we disclose your personal information to anyone outside our company.

You may also have the right to have incomplete personal information completed, including by means of providing a supplementary statement. Whether this is appropriate in each particular case depends on the purposes for which your Personal Information is processed.

We are required to notify any third parties with whom we have shared your personal information that you have made a request for rectification. We will take reasonable steps to do so, but where this is impossible or would involve disproportionate effort, we may not be able to do so or guarantee that they will rectify the Personal Information they hold.

WHAT ARE THE LIMITATIONS ON ACCESS TO AND CORRECTION OF YOUR PERSONAL INFORMATION?

As a general rule, we will provide you with access to the personal information we hold about you or take steps to correct any inaccurate personal information if you ask us to do so in writing.

Due to legal privilege, we will not be able to show you anything that we learned in connection with a claim or legal proceedings.

Deletion of your personal information

WHEN CAN YOU REQUEST DELETION?

You have the right to request the deletion of your personal information and the restriction of its processing if:

- the personal information is no longer necessary for the purpose for which it was originally collected / processed
- you withdraw your consent (where consent was previously given)
- you object to the processing and our legitimate interests in continuing to process your Personal Information do not override your interests
- we process your personal information in breach of data protection laws
- the personal information must be erased in order to comply with a legal obligation

WHEN MAY WE REFUSE REQUESTS FOR DELETION?

The right to erasure does not apply where we are required to retain the personal information for legal or regulatory purposes or where your personal information is processed for certain purposes, including the establishment, exercise or defence of legal claims.

More importantly, if we are required to delete your data, we may not be able to provide you with some or all of our services.



DO WE HAVE TO NOTIFY OTHER RECIPIENTS OF YOUR PERSONAL INFORMATION OF YOUR REQUEST FOR DELETION?

If we have disclosed the personal information that you wish to have deleted to third parties, we are required to notify them of your deletion request so that they can erase the relevant personal information. We will take reasonable steps to do so, but this may not always be possible or may require disproportionate effort.

It may also be the case that the recipient is not required or is unable to erase your personal information because one of the above exceptions applies.

Restriction of the processing of your personal information.

WHEN DOES RESTRICTION APPLY?

If we have disclosed the personal information that you wish to have deleted to third parties, we are required to notify them of your deletion request so that they can erase the relevant personal information. We will take reasonable steps to do so, but this may not always be possible or may require disproportionate effort.

It may also be the case that the recipient is not required or is unable to erase your personal information because one of the above exceptions applies.

Restriction of the processing of your personal information.

WHEN DOES RESTRICTION APPLY?

You have the right to restrict the processing of your personal information:

- if you contest the accuracy of the personal information, we must restrict processing until we have verified the accuracy of the personal information
- where the processing is unlawful and you oppose erasure and request restriction instead
- where we no longer need the personal information, but you require it for the establishment, exercise or defence of legal claims
- where you have objected to processing in the circumstances described in point (a) "Objection to processing", and we are considering whether those interests should override

DO WE HAVE TO NOTIFY OTHER RECIPIENTS OF YOUR PERSONAL INFORMATION ABOUT THE RESTRICTION?

If we have disclosed your relevant personal information to third parties, we are required to inform them of the restriction on processing your personal information so that they do not continue to process it.

We will take reasonable steps to do so, but this may not always be possible or may require disproportionate effort.

We will also inform you if we decide to lift the restriction on processing.

Take your personal information with you.

WHEN DOES THE RIGHT TO DATA PORTABILITY APPLY?

The right to data portability applies only:

We will take reasonable steps to do so, but this may not always be possible or may require disproportionate effort.

- to personal information that you have provided to us (i.e. not to any other information)
- where the processing is based on your consent or on the performance of a contract
- where the processing is carried out by automated means

WHEN MAY WE REFUSE REQUESTS FOR DATA PORTABILITY?

We may refuse your request for data portability where the processing does not meet the criteria set out above. In addition, where the personal information relates to more than one individual, we will not be able to transfer it to you if doing so would adversely affect the rights of that individual.

Objection to processing.

You may object to processing in the following cases:



- **LEGITIMATE INTERESTS**

You have the right to object at any time, on grounds relating to your particular situation, to the processing of personal information concerning you that is based on legitimate interests.

If we can demonstrate compelling legitimate grounds for the processing of your personal information which override your interests, rights and freedoms, or if we need your personal information for the establishment, exercise or defence of legal claims, we may continue processing. Otherwise, we must stop using the relevant personal information.

- **DIRECT MARKETING**

Legal information

This privacy statement has been prepared on the basis of provisions of several legislative acts.

Key definitions

Personal Information (or Data)

Any information that directly, indirectly, or in connection with other information, including a personal identification number, allows for the identification or identifiability of a natural person.

Usage Data

Information collected automatically through our application and/or our website (or third-party services used by us), which may include: the IP addresses or domain names of your computer, URI (Uniform Resource Identifier) addresses, the time of the request, the method used to submit the request to the server, the size of the file received in response, the numerical code indicating the status of the server's response (successful outcome, error, etc.), the country of origin, the features of the browser and operating system used by you, various details about the time of each visit (for example, the time spent on each page within the Application and/or on our website), and details about the path followed within the Application and/or on our website, with special reference to the sequence of pages visited, and other parameters about the device operating system and/or your IT environment.

