

## **PRIVACY POLICY**

This statement outlines the policy of IronX (“the Company” or “we” or “us”) and its Affiliate Members (both the Company and its Affiliate Members hereinafter to be referred jointly as the “Companies”), on how the Companies manage the personal information that they hold about the Company’s clients and others. This privacy policy applies to all website users, whether you are a former, existing or potential client or just a visitor of our website. The Companies are the data controllers for purposes of the data protection legislation.

Your privacy is of the utmost importance to everyone involved. To protect your privacy, we follow different principles in accordance with worldwide practices for client privacy and data protection.

- We will not sell or give away your name, mail address, phone number, email address or any other information to anyone, except as described in this policy.
- We will use various security measures to protect your information from unauthorised users.
- We may pass your personal information to the Companies,
- We may also pass your personal information to technology providers and/or social trading businesses.
- Any or all of these persons, bodies or entities may contact you with information about services, which may be of interest to you, including by email, SMS, fax or automated calling systems: please tick the relevant box on our web page to confirm that you agree to this.

### **Personal Information**

Considering our nature of business and to perform our services offered to you efficiently, we will collect personal information.

### **Notice**

We will ask you when required for information that personally identifies you (personal information) or allows us to contact you. Generally, this information is requested when you apply for a demo or a live account with us as well as participating in any offer we promote to our existing or potential clients as well as to any visitors on our website. The main purposes we use your personal information for is to introduce you to our Affiliate Members, to treat you fairly, and to understand your financial objectives and to ensure that relevant services are appropriate to your profile, as well as to provide you with sales and post sales services.

The personal information that will be collected from you includes:

- personal details you provide to us on applications and other forms,
- financial details such as estimated annual income and net worth and your trading experience and investment knowledge,

- documents that you provide to us to verify your identity, such as your passport, utility bills, and/or bank statement or your company incorporation details.

We generally need to keep your personal information on record for a period of at least five (5) years, which is calculated after the execution of the transactions or the termination of the business relationship or in the case you wish to terminate your working relationship with us. Subject to that, when we consider information is no longer needed, we will remove any details that will identify you or we will securely destroy the records.

The Companies may use your personal information for one or more of the following purposes:

- to confirm your identity;
- to assess your suitability to the products and services our Affiliate Members provide;
- to process your transactions;
- to provide you with transaction and post transaction related services;
- to inform you of products and/or services that may be of interest to you;
- to keep you updated on the issues that are relevant to your business relationship with the Companies;
- to improve the Site;
- to analyse statistical data to enable us to provide you with better products and/or services.

We and/or our Affiliate Members occasionally hire other companies to provide limited services on our behalf, including sending newsletters and other correspondence whether through electronic means or via postal mail, etc. We and/or our Affiliate Members will only provide those companies the information they need to deliver the service, and they are prohibited from using that information for any other purpose.

The Companies will disclose your personal information, without notice when required to do so by law or in good faith that such action is necessary to: (a) protect the Companies' rights and/or comply with any court order or judicial proceedings; (b) avoid any potential fraud; (c) conform to the edicts of the law or comply with a legal process served on us, our Affiliate Members or the site; (d) protect and defend the rights or property of us, our Affiliate Members and its family of Websites, and, (e) act in urgent circumstances to protect the personal safety of users of us, our Affiliate Members, its Websites, or the public.

## **Cookies**

We use cookies to gather information about your access to our website and other services we provide to you. Cookies are small files of letters and numbers, which use a unique identification tag and if you agree, they are stored on your device as a result of you using this website or other services we provide to you. These cookies allow us to distinguish you from other users of our website, which helps us to provide you with a good experience when you browse our website and allows us to improve our website.

Please click at the relevant point on our web page to confirm that you agree to our use of cookies on your device.

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 the Companies provide to you in relation to your account.

## **Consent**

By visiting and/or accessing this website, you consent to the Companies to collect, maintain and use your personal information as per this policy.

## **Security**

The Companies have taken strong measures to protect the security of your personal information and to ensure that your choices for its intended use are honored. The Companies take strong precautions to protect your data from loss, misuse, unauthorised access or disclosure, alteration, or destruction.

The Companies strictly protect the security of your personal information and honor your choices for its intended use.

You also have a significant role in protecting your information. No one can see or edit your personal information without knowing your user name and password, so do not share these details with others.

## **Access**

You have the right to obtain a copy of any personal information which the Companies hold about you and to advise us of any perceived inaccuracy. To make a request, please write to us, verifying your identity and specifying what information you require. We may charge a fee to cover the cost of verifying the application and locating, retrieving, reviewing and copying any material requested. We will acknowledge your request and respond to it within 40 days of receipt of your application and any applicable fee.

## **Enforcement**

We reserve the right to change this policy anytime. Changes will be posted on this policy, therefore you are encouraged to visit and review this policy from time to time. In case you have any queries, wish to access or update your personal details, or do not wish to receive marketing material from us, please email us at [privacy@ironx.com](mailto:privacy@ironx.com).

### **Links to third party websites**

This website may have links to external third party websites that may benefit you. Please note, however, that third party websites are not covered by our privacy policy and these sites are not subject to our privacy standards and procedures.

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