



ICLOUDFX

PRIVACY
POLICY

31 December 2013



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PRIVACY POLICY

1. Introduction

IcloudFX Ltd (hereinafter referred to as 'icloudfx.com', 'Company', 'we', 'our', 'us' as appropriate) operating under the trading name icloudfx.com is a Cypriot Investment Firm (hereinafter referred to as "CIF") registered with the Registrar of Companies and Official Receiver in Cyprus under registration number HE 203997 and regulated by the Financial Sector Conduct Regulator (hereinafter referred to as "FSCR") under license number 07907.

The Company is registered with the Office of the Commissioner for Personal Data Protection of the Republic of Cyprus for the purposes of personal data processing. Therefore, your personal data is kept and handled in accordance with the Processing of Personal Data (Protection of the Individual) Law of 2001, its amendment (Law No. 37(I)/2003) and the Processing of Personal Data (Protection of Individual) Amending Law 2012 (Law. No. 105(I)/2012 and the Regulation of Electronic Communication Data Protection Act 1998, as amended from time to time. The Company is the data controller responsible for your personal data.

2. Scope of the Privacy Policy

The scope of this Privacy Policy is to provide you (or data subject) with information of how icloudfx.com collects and uses information through its site www.icloudfx.com. This Privacy policy does not apply to websites operated by other organizations and other third parties. By registering with, or accessing the icloudfx.com website, you consent to the collection, use and processing of your personal data.

3. Commitment

icloudfx.com respects the privacy of any user that accesses its website(s). We are therefore committed in taking all reasonable steps in safeguarding the personal data of any existing or prospective clients, applicants and visitors.



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4. Data Protection Officer

We have appointed a Data Protection Officer (“DPO”). Our DPO has a number of important responsibilities including but not limited to:

- a. monitoring icloudfx.com’ compliance with the provisions of the GDPR;
- b. raising awareness of data protection issues, training icloudfx.com’ staff and conducting internal audits; and
- c. cooperating with the supervisory authority.

If you have any questions about this privacy policy, including any requests to exercise your legal rights, please send us an email at: DPO@icloudfx.com

5. Information we collect

Throughout our cooperation we collect information directly from you, through any correspondence made with us by phone, e-mail or otherwise; including information which you enter when you register to use our website, mobile app, subscribe to our service or any other activities carried out on our website or any connected applications. The information we collect may include but are not limited to your first and last name, email, country and city of residence, phone number, social media profile details, IP address, nationality, tax identification number, date of birth, residential address, bank details, financial situation, employment status, trading activity, transaction history, account balance information (“Personal data”). We are also required by law to collect certain Know Your Client (“KYC”) documentation in order to verify your identity. KYC documents may include but are not limited to:

- a. Proof of identity (e.g. ID/Passport, driving license)
- b. Proof of address (e.g. Utility bill, driving license)
- c. Proof of credit card statement (e.g. Bank Statement)

We may also collect indirect information from you, which we use purely for verification, security or purely for browsing/ functionality purposes. Such information may include your (IP) address, browser type, operating system, mobile device ID and/or any device ID, Internet service provider (ISP), cookies. Please also read our Cookies Policy that you can find at our Legal Page.



6. Purpose for which we will collect your personal data

We collect, use, disclose, store and process your personal data for the performance of our services as required by law. We use your personal data to provide you with the services you request through our Website and Platform so as to perform our contractual obligations related to those services.

We also collect your personal data for internal purposes including the improvement of customer experience, promotional and marketing services (e.g. emails, social media, SMS), customer care, training purposes and administration matters. Such data is safely stored via physical or electronic means and procedural controls, and it is treated CONFIDENTIAL. We only collect personal data that is adequate and relevant for the purposes of our business and for a reasonable period of time as required by law. We never ask for more information that is required by law.

7. Your legal rights

You have the below rights under data protection laws in relation to your personal data:

a. Request for information and access to your personal data:

You have the right to information which includes among others, where personal data is stored, how the data was collected, and for what purpose. You also have the right to access your personal data. If you wish to receive a copy of the personal data we hold about you, we will give you such a copy upon receiving a written request by you, unless any relevant legal requirement prevents us from doing so. Please note that we may need to request specific information from you or contact you to ask for further information to help us confirm your identity. This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it.

b. Request correction/rectification of the personal data that we hold about you:

You have the right to correct any inaccurate or incomplete data we hold about you, though we may need to verify the accuracy of the new data you provide to us. If you require this, then please reach out to our support team at: support@icloudfx.com.

c. Request erasure of your personal data:

You have the right to request erasure/deletion of your personal data (“right to be forgotten”) where there is no good reason for us continuing to process it. Note, however, we may not



always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request. As a FSCR authorized firm, we are under certain obligation to retain certain data to a maximum of seven years.

d. Object to processing of your personal data:

You have the right to object to the processing of your personal data, if you feel it impacts on your fundamental rights and freedoms. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights. As a FSCR authorized firm, we are under certain obligations to process and retain certain data for compliance purposes. If you object to the processing of certain data, then we may not be able to provide our services to you.

e. Request restriction of processing of your personal data:

You have the right to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it. Please note that any requests in relation to the restriction of the processing of your data means that we may not be able to perform the contract we have or are trying to enter into with you. In this case, we may have to cancel your use of the icloudfx.com Services, but we will notify you if this is the case at the time.

f. Request the transfer of your personal data to you or to a third party.

You have the right to request the transfer of your personal data to you or to a third party. If you require this, then please reach out to our support team at: support@icloudfx.com.

g. Withdraw consent where we are relying on consent to process your personal data.

However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide you with our services. We will advise you if this is the case at the time you withdraw your consent.

8. Our legal obligations

We may be required to retain and use personal data to meet our legal requirements, for data security purposes and as we believe to be necessary or appropriate in order to: (a) comply with our obligations under applicable law and regulations, (b) respond to requests from



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courts, law enforcement agencies, regulatory agencies, and other public and government authorities, (c) monitor compliance with and enforce our Platform terms and conditions; (d) carry out anti-money laundering, sanctions or KYC checks as required by applicable laws and regulations; or (e) protect our rights, privacy, safety, property, or those of other persons.

We may also be required to use and retain personal data after you have closed your icloudfx.com account for legal, regulatory and compliance reasons, such as the prevention, detection or investigation of a crime; loss prevention; or fraud prevention.

9. Transfers of personal data outside of EEA

The data we collect from you will be transferred to and stored at a destination inside the European Economic Area (“EEA”). However, in order to provide the services to you, you acknowledge that it may be possible to transfer your personal data to someone else who provides a service to us in other countries outside of the EEA which does not offer the same level of protection as the EEA, and you consent to such transfer.

10. Disclosure of your Personal Data

We disclose and/or share your personal data when necessary to provide our services or conduct our business operations. When we share personal data, we do so in accordance with applicable data privacy laws and our internal security standards. We do not sell personal data or client databases we collect. We do not distribute or transfer any data of our clients to any unauthorized or non-affiliated to it, third parties.

Below are the parties with whom we may disclose and/or share personal data:

a. Within icloudfx.com group of Companies:

The Company is part of the icloudfx.com group of Companies (“icloudfx.com group”). In order to meet our contractual obligations to you, the Company is supported by icloudfx.com group employees and contractors. For the provision of services, we may make personal data available to them if necessary. All of our employees and contractors are required to follow our data privacy and security policies when handling personal data.

b. Our third-party providers:

The Company is supported by third party providers/service providers. We may disclose data to our service providers that we do business with if necessary. In those cases, we retain



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confidentiality agreements, and any data we may disclose is always on a “need to know” basis, and solely for the provision of our services to you. Such services may include cooperation with financial institutions, such as banks and payments processing providers, promotional functions, direct marketing services, software system and platform support, cloud hosting services, advertising (including affiliate advertising), data analytics.

c. Regulatory disclosure:

We will also share and/or disclose personal data if we believe it is required, to third parties for legal reasons in order to comply with legal obligations, including but not limited to law enforcement and other public authorities.

d. Affiliate Marketing:

We have an affiliate marketing program called forex Affiliate/easy markets partners which is a commercial arrangement whereby third parties promote icloudfx.com and its products and services in return for a fee. We do not share your personal data with these third parties.

11. Data Security

Your security and data protection is of utmost importance to us. All information you provide to us is stored on our secure servers, where it is protected by our comprehensive, modern, and well-maintained data security infrastructure. We protect your information by using data security technology that includes, but is not limited to such systems as firewalls, encryption, access controls; physical security; physical and logical network separation; technology audit tools; and appropriately administered and monitored internal roles and procedures.

Unfortunately, the transmission of information via the Internet is not completely secure. We will take all steps reasonably necessary to ensure that your personal data is kept secure and protected in accordance with our legal obligations and standards. If this is not possible, for example because we are required by law to disclose data, we will ensure that the sharing of the data is lawful.

12. Data Retention

We will retain your personal data for a period of time as we deem necessary for legal and/or business purposes subject to a maximum of seven years upon the end of our business relationship. Your personal data will be securely deleted and/or destroyed when no longer needed.



13. Cookies

Cookies are small text files that are sent to and stored on your device, such as desktop and laptop, smartphone, tablet/phablet, for accessing the internet, when you visit a website or a page. Cookies allow a website to recognize a user's device. The objective of cookies use is to improve and make the user's experience easier. By using www.icloudfx.com you agree to our use of cookies to enhance your experience. To get more information on our Cookies Policy visit our Legal Page.

14. Marketing

We may collect personal Information through social media sites when you interact with us on one of our social channels, via our Apps or/and from other sources, such as public databases; joint marketing partners; social media platforms; from people with whom you are connected on social media platforms, as well as from other third parties.

We may send you information by SMS, push notification, email, in-app notification or contact you by telephone or by any other means to provide you with information about our products, services, training and offers we think would be of interest to you. If you receive email communications from us about the market or your activity on the platform and don't want to in the future, you may opt out by clicking the unsubscribe link situated at the end of each email sent to you or by notifying the member of staff that contacted you and we will stop sending you this information. If you have any further questions, please do not hesitate to contact us by email at support@icloudfx.com.

Also, when you are logged into your account you can manage your preferences by going to "Notifications" tab (My Account > My Notifications > Edit Market Alerts) and manage your subscriptions.

15. Changes to Privacy Policy

Any changes we may make to our privacy policy in the future will be posted on our website and, where appropriate, notified to you by e-mail and/or when you next start the App or log onto the Site. The new terms may be displayed on-screen and you may be required to read and accept them to continue your use of the App or the Services.

Please note that we reserve the right to amend, revise, modify and/or change our Privacy Policy at any time.



16. Our Communication with You

You can contact us at any time with questions or concerns. We will notify you separately (probably, with a pop-up notice) if we process your personal data for any other purpose and, if required, ask for your consent. You can control what and how you receive communications from us and how we use your information.

You are entitled to request a copy of your personal data that we hold. You may also modify your personal data at any time. If you would like to raise a complaint or comment, please contact us by email at: DPO@icloudfx.com

If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law, you can escalate your complaint to the data protection regulator in your jurisdiction. The Office of the Commissioner for Personal Data Protection is at 1 Iasonos str.,1082 Nicosia. Further information is available on the Office of the Commissioner for Personal Data Protection's website [here](#).

Please note that we will try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.



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