

Privacy and Security Policy

SMPFX CURRENCIES & MONETARY BROKERS L.L.C, (“SMPFX”, “we”, “our” or “us”) is a limited liability company incorporated under United Arab Emirates law. The company is registered with the Department of Economic Development (no. 1244252) and has its principal place of business at Al Khabeesi, 437-0 Office 101-09 Almarzouqi building, Dubai.

SMPFX is committed to protect the privacy of all personal data which is obtained from you, including the data we obtain during your visits to the **SMPFX** website. **SMPFX** handles, retains and processes your data only insofar as this is in accordance with the applicable legal requirements and only to the extent it is necessary for the achievement of the purposes set out herein.

Please view the following Privacy Policy Statement which indicates how we use your personal data, its collection, how it is stored and processed. The Privacy policy also explains your rights under the law relating to your personal data.

References in this document to “personal data” are references to personal data and sensitive personal data as defined in Processing of Personal Data (Protection of Individuals) Law 138(1) of 2001 as amended from time to time, as well as the General Data Protection Regulation (GDPR) (EU 2016/679) and to the extent applicable, the data protection or privacy of laws of any other country.

SMPFX, our associates, employees, members, agents and/or contractors which we engage or work with for the purpose of collecting, storing and processing Personal Data and any third parties acting on our behalf, may collect, process, use and store Personal Data provided by you for the purposes of carrying out transactions, and/or other services, operational support and development of our or their business.

Type of collected information:

In order for **SMPFX** to provide its clients with its offered services, **SMPFX** is required to collect, process and retain personal data of its clients in accordance with the mandatory legal requirements. This includes, among others, your name, date of birth, residential address, passport number, email address, telephone number, profession, payment information and information concerning your financial status.

In order to provide our products and services, we may collect your information through several different sources, including but not limited to:

- Website and forms
- Website Live Chat
- CRM system
- Phone
- Email
- Third Party Processors and Service Providers
- Existing Clients
- Partners, Employees

SMPFX also collects and processes personal information about you, which is necessary in order to provide you with its services. This includes information about you when you complete an online application or another type of form and when you access, use or trade through your **SMPFX** account. Additionally, we may also obtain personal information as a result of authentication or identity checks, including checks with credit reference agencies (who may keep a record of the information) to prevent fraud.

SMPFX may also derive information from your use of the **SMPFX** website and software client and may store this information with your personal profile. This information may include site areas visited, pages viewed, frequency and duration of visits, Internet Protocol (IP) address, computer identification parameters, types of transactions conducted, documents downloaded, mouse clicks, mouse movements, scrolling activity as well as text you type in this website and which website referred you to ours or to which websites you link.

Steps to protect personal information:

At **SMPFX**, we are committed to protect and maintain your privacy and have taken action and measures to do so.

These include, but not limited to: computer safeguards such as firewalls and data encryption; enforcement of physical access controls , limited authorized access to employees who need it in order to perform their responsibilities; encryption during data transmission, strong authentication mechanisms and the separation of machines and data to provide secure areas.

While such systems and procedures reduce the risk of security breaches, they do not provide absolute security. Therefore **SMPFX** cannot guarantee that our service will be

immune from any wrongdoings, malfunctions, unlawful interceptions or unauthorized access to the information stored therein and to other information security risks, or that your private communications on or through our service will remain private.

Processing of personal information

Access to personal information is restricted to those employees, partners, contractors and affiliates of **SMPFX** (including without limitations, parent, sister and subsidiary companies) who need to access such information for the purposes described in this policy. Those with access to personal information are obligated to comply with strict standards of confidentiality when managing personal and other data.

External linking

When you use the **SMPFX** website, you may be able to link to other websites. This Privacy & Security Policy does not apply to those other sites which you may choose to link from **SMPFX**'s website and we are not responsible for any personal information collected by third parties via those other sites.

Usage and sharing of anonymous statistical information

SMPFX collects anonymous statistical information in order to ensure that it meets the needs of its clients. By collecting such data, **SMPFX** is able to monitor and improve the services which it offers to its existing and potential clients. We may share such anonymized information with third parties.

SMPFX may use your personal information and share it with partners contractors, service providers, advisors, transaction processors and affiliates of **SMPFX** (including parent, sister and subsidiary companies) (the "Partners") for the following purposes only, and upon your explicit consent:

- to provide you the services that you have requested including processing transactions
- to confirm your identity

- to assess your suitability
- to access products and services we provide
- to maintain your personal profile
- to manage your account
- to contact you when necessary or appropriate in relation to the services being provided to you, including via a third party mailing platform
- to keep you updated while you are a client in relation to matters such as contracts you have traded and activities of **SMPFX**
- to manage and administer the products and services provided to you
- for marketing purposes, including, but not limited to providing you with information regarding the products and services offered by **SMPFX** and its Partners
- to develop an understanding of the products and services that you may be interested in obtaining from **SMPFX** and to tailor the website to your needs and interests
- to create impersonalized statistical data
- to conduct surveys and questionnaires
- to enforce the governing terms and conditions

If **SMPFX** believes that you have breached the governing terms and conditions, or abused your rights to use the services, or performed any act or omission that **SMPFX** believes to be violating any applicable law, rules, or regulations, then **SMPFX** may share your information with law enforcement agencies and other competent authorities as well as with other third parties, as may be required;

If **SMPFX** is required, or believes that it is required by law to share or disclose your information to financial authorities or to any other third party;

- In any case of dispute, or legal proceeding of any kind between you and **SMPFX**, or between you and other clients or third parties with respect to, or in relation with the services **SMPFX** provides
- In any case where **SMPFX** believes that sharing information is necessary to prevent imminent physical harm or damage to property
- If **SMPFX** organizes the operation of its services within a different framework, or through another legal structure or entity, or if **SMPFX** is acquired by, or merged with another entity, provided however, that those entities agree to be bound by the provisions of this policy as well as confidential agreements

Choice and opt-out

In the registration process with **SMPFX** as a client, you will be given the option to opt-out of subscribing to the following additional services:

- Marketing services, Client orders, liaise with **SMPFX**
- Newsletters
- SMS (text) messages
- Other electronic communications

If you no longer wish to receive the above mentioned communications, you may opt-out of receiving them by sending us an email via the website.

The email needs to contain the following:

- Name and surname
- Account Number (if any)
- The email used in the registration process

Transfer of data to third countries

Personal data may be transferred by **SMPFX** to third parties in European Economic Area Member States as well as to non-European Economic Area Member States for the purposes described in this policy. You give your express and unambiguous consent to such transfer, provided that such transfer will always happen under the regulations for data protection governing our operations.

Updating your information

You may inform **SMPFX** at any time that your personal details have been changed by emailing us via the website. We will change or delete your personal information in accordance with your instructions, except to the extent that we are required to hold your personal information for regulatory or legal purposes, to provide you with the services you have requested or to maintain adequate business records, in which case your personal information will be deleted on the expiration of such mandatory period. In any case, **SMPFX** may keep any aggregated or anonymized information for the purposes described in this Privacy and Security Policy, indefinitely.

Cookies

Cookies are small files of information, which often include a unique identification number or value, which are stored on your computer's hard drive as a result of your use of the **SMPFX** trading software and/or access of the **SMPFX** websites.

We use both session ID cookies and persistent cookies. A session ID cookie expires when you close your browser. A persistent cookie remains on your hard drive for an extended period of time.

We set a persistent cookie for statistical purposes. Persistent cookies also enable us to track and target the location and the interests of our users and to enhance the experience of our services on our site.

You can remove persistent cookies by following directions provided in your Internet browser's "help" file. If you do not wish to receive cookies altogether, 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. Some persistent cookies, such as Flash cookies, cannot be removed and cannot be blocked by changing your browser's settings.

Some persistent cookies will not be removed or blocked by your internet browser. If you wish to disable all cookies, please send an email request via the website.

Remarketing with Google Analytics

We may use the information we collect to assist us in delivering relevant ads to you (Remarketing). Remarketing is a way for us to connect with our websites and ads visitors, based upon their past interactions with our website and ads. Third-party marketing vendors may be hired by **SMPFX** to perform such remarketing services. As a result, third-party vendors, including Google, may show **SMPFX's** ads on internet sites. Such third-party vendors, including Google, may also use their cookies, third party cookies and similar technologies to serve ads based on a visitor's prior visits to **SMPFX's** website.

You may opt out of Google Analytics for Display Advertisers and opt out of customized Google Display Network ads by visiting Google's Ads Preferences Manager. You are also encouraged to visit Google Analytics Opt-out Browser Add-on.

For further information you can also visit Google's privacy center.

Your rights

It is not mandatory for you to provide us with any of the personal data requested by **SMPFX**. However, without providing the information requested in the application form, **SMPFX** may not be able to open an account for you or to provide you with any other services, information or assistance you have sought or evaluate the appropriateness of the service you are requesting.

You have the right to request and be provided with the following:

- Information regarding all your Personal Data which we hold and which has been subject to processing as well as information as to how such data was obtained, the purpose for which the data is processed, the recipients, the categories of data processed or to be processed, the processing which has taken place since the data subject was last updated regarding the processing and the rationale behind the automated processing system
- Any correction and deletion of your Personal Data which has not been processed in accordance with the applicable requirements due to lack of information or discrepancies
- Any notification made to any third party as to any amendments made in accordance with (2) above, unless this would be disproportionately burdensome for us

Affiliates and Partners

SMPFX may share information with partners, Associates and Third Parties in the event such information is reasonably required by such Associates and Third Parties in order to:

- Offer additional similar products and services that meet your needs and which are delivered in a manner that is useful and relevant (only where you have authorized us to do so); and/or

- Service customer accounts.

SMPFX does not sell, license, lease or otherwise disclose personal information to third parties, except as described in this Privacy Statement.

Enforcement

SMPFX is doing its utmost to comply with this Privacy and Security Policy. If you have any questions, concerns or complaints regarding this Privacy and Security Policy and the enforcement thereof, please refer them to us on an email via the website. After receiving your complaint, **SMPFX** may contact you to better understand your concerns and will make all efforts to promptly answer your question, or resolve your complaint to your full satisfaction.

SMPFX has appointed a data protection officer (DPO), who is responsible for overseeing the data protection strategy and implementation, in order to ensure compliance with the General Data Protection Regulation (GDPR). If you have any questions, concerns or complaints regarding our data protection strategy and implementation, please refer them to us on an email sent via the website.

Amendments to policy

SMPFX may change and update the terms of this Privacy and Security Policy from time to time. All changes will take effect seven (7) days after their initial posting on the Website, unless **SMPFX** amends the Privacy and Security Policy to comply with legal or regulatory requirements. In the latter cases the amendments will become effective as required, or ordered.

Governing Law

In respect of issues not addressed in the present Privacy and Security Policy, the law of UAE will apply.

Consent

By continuing to use our website or other services offered through it, you are agreeing to the collection, processing and use of your personal data by **SMPFX**.