

# PRIVACY AND COOKIES POLICY

## Indication Investments Limited

CYSEC License number 164/12

## PRIVACY AND COOKIES POLICY

Libertex (libertex.com) is brand name of Indication Investments Limited regulated by the Cyprus Securities and Exchange Commission, CySEC, (www.cysec.gov.cy), under the license number 164/12. Indication Investments Ltd Offices is located at Gladstonos and Karaiskaki Street, 3032, Limassol, office no. 031 , Limassol , Cyprus (hereinafter: “We”, “Libertex”, the “Company”)

To help Libertex to understand the needs of its customers and improve service, data collected on this website will be held on Libertex secure database. All customer data stored on Libertex servers complies with statutory requirements. We will never make this data available to any other company or third party.

### Collection of personal data

The Company will collect and hold personal data about you when you complete an online application for a live or demo account or other type of form or when participating in any other offer the Company promotes through this website.

The Company collects certain personal data in order that it may meet the needs of its customers through the efficient provision of services. By collecting certain personal data, the Company is able to monitor and improve the services which it offers to its existing and potential customers.

When you create an account on the Platform, we require you to provide your first and last name, email address, details about your financial status, your residential address, phone number, date of birth, a copy of your photo-ID, such as passport, driving licence, or national ID, a copy of a recent utility bill/bank statement (or similar) as evidence of your residential address and credit card or bank card details. We use this data to verify your identity and to set up and administer your Libertex account, provide technical and customer support and training and send you important account, subscription and service data (which may be sent by notifications through the Platform).

### Use of personal data

The Company may use your information for any one or more of the following purposes:

- § To confirm your identity;
- § To maintain your personal profile;
- § To assess your suitability to the products and services we provide;
- § To provide the services to you that you have requested including processing 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 us;
- § To tailor the website to your needs and interests;
- § To analyze impersonalized statistical data to enable us to provide you with better products and/or services;

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§ To administer your account and monitor its conduct and assess and analyse any credit limit, including, the interest rate, fees and other charges to be applied to the Client's Account;

## Data retention

We will only retain your personal data for as long as we reasonably require it for legal or business purposes subject to a maximum of seven years. In determining data retention periods, we take into account local laws, contractual obligations, and the expectations and requirements of our customers. When we no longer need personal data, we securely delete or destroy it.

## Personal data disclosure

We share or disclose your personal data when necessary to provide services or conduct our business operations as described below. When we share personal data, we do so in accordance with applicable data privacy laws and our internal security standards.

The Company may be required to provide your personal data to the Cyprus Securities and Exchange Commission and other regulatory and government bodies in Cyprus and other countries as may be required by law from time to time.

The Company will disclose your Personal Data, without notice when required to do so by law or in good faith that such action is necessary to:

- where required by law or a court order by a competent Court;
- where requested by our Supervisor (the Cyprus Securities and Exchange Commission) or any other regulatory authority
- to other service providers and professional advisors who create, maintain or process databases
- to a Trade Repository or similar;
- to introducing brokers and affiliates with whom we have a mutual relationship;
- to other third parties to process your information to provide us with services globally, including for customer support, payments processing, verification information technology, payments, sales, marketing, data analysis, research and survey;
- to other service providers for statistical purposes in order to improve our marketing, in such a case, the data will be provided in an aggregate form;
- where necessary in order for us to defend or exercise our legal rights to any court or tribunal or arbitrator or Ombudsman or governmental authority, as the case may be;
- to our Affiliates or any other company in our group;
- to our employees so as to exercise their duties to further the Agreement between us, or to assure the efficient functioning of our Platform

## Data security

We are committed to safeguarding and protecting personal data and will implement and maintain appropriate technical and organizational measures to ensure a level of security appropriate to protect any personal data provided to us from accidental or unlawful destruction, loss, alteration, unauthorized disclosure of, or access to personal data transmitted, stored or otherwise processed.

Access to Personal Data is restricted to employees and authorized service providers who need it to perform their work. You must not share or disclose your log in details with any third party.

## Data protection rights

You are not obligated to provide any of the personal data requested by the Company. In the absence of this information, however, the Company may not be able to open an account for you where the information is requested in on an application form, or to provide you with any other services, information or assistance you have sought.

We respect your right to access and control your personal data. We will respond to requests for personal data and, where applicable, will correct, amend or delete your personal data.

§ Access to personal data: We will give you access to your personal data (including a copy or the ability for us to send your personal data to another provider) on request, unless any relevant legal requirements prevent us from doing so or other exemptions apply. Before providing access to you, we will ask you to prove your identity and give us sufficient information about your interaction with us so that we can locate any relevant data.

§ Correction and deletion: You have the right to correct or amend your personal data if it is inaccurate or requires updating. You may also have the right to request us to delete your personal data. If you request that we delete your personal data this will result in the automatic closure of your account and we will remove your personal data from active processing. However, we will be required to maintain your personal data to comply with our legal and regulatory requirements.

Under the Cyprus data protection legislation, you have (subject to certain exceptions) the right to request any personal data the Company holds about you and to inform the Company of any perceived inaccuracy. We may charge a fee to cover the associated administrative costs.

## COOKIES

Cookies are small text files stored by your browser on your computer or device when you visit certain pages or perform certain actions on this and other websites. They are used to help your browser remember your choices and display

the correct information for you - such as items in your basket - and not treat you as a new visitor each time you visit a page.

Some cookies are only set for the duration of your visit (“session cookies”) to help you get around and give you relevant information. Others are set for longer periods (“persistent cookies”) so that your browser can remember your choices from a previous visit. The cookies stored cannot harm your device, are anonymous, and unique to your browser.

You can choose to disable or block these cookies in your browser but without some of them our site will not work. For more detailed information about cookies please visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

## HOW WE USE COOKIES?

At Libertex we use cookies to help us find which services you are interested in and remember details about your application. We don't store sensitive information like your name or address in our cookies, just an anonymous reference to them so that we're able to find them.

We also occasionally set cookies to help you navigate around the site, enhance your experience, or give you important information regarding interests.

## THIRD PARTY COOKIES

In order to give you the best possible client experience, we partner with a number of Third parties to help us collect anonymous statistics about how our site is being used and provide you with further information that may be of interest to you. As part of this process our Third party partners may set their own cookies during your visit.

These Third parties may include, but are not limited to, Google, Inc. ([google.com/analytics/](http://google.com/analytics/)), Tealium Inc. ([tealium.com](http://tealium.com)), Mixpanel, Inc. ([mixpanel.com](http://mixpanel.com)), Salesforce.com, Inc. ([salesforce.com](http://salesforce.com)).

## COOKIES SETTINGS

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, it is strongly recommended that you allow cookies on our website to ensure you have the best possible experience. Turning off cookies may result in reduced performance of our website and trading platform and may also impair the quality of the services that we provide to you in relation to your account.

## GOOGLE ANALYTICS

We use Google Analytics on the website, a web analytics service provided by Google, Inc. (“Google”). Google Analytics is used to help us obtain data regarding use of the website. The information generated by the cookie about your use of the website (including your IP address) may be transmitted to and stored by Google on servers in the United States. Google will use this information for evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google’s behalf. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full website functionality. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

## WHERE WE STORE AND PROCESS YOUR PERSONAL DATA

The data that we collect from you may be transferred to, and stored at, a destination outside the European Economic Area (“EEA”). It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers or Affiliate companies. Such staff may be engaged in, among other things, the fulfilment of your request, the processing of your payment details and the provision of support services. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

## YOUR CONSENT

By using our website and allowing cookies on your browser which gives us access to certain information or manually submitting your information to us you consent to the use of that information as set out in this policy. If we change our privacy policy we will post the changes on this page, and may place notices on other pages of the website, so that you may be aware of the information we collect and how we use it at all times. Continued use of the service will signify that you agree to any such changes.

## HOW TO CONTACT US

We welcome your views about our website and our privacy policy. If you would like to contact us with any queries or comments please send an e-mail to [info@libertex.com](mailto:info@libertex.com).

## UPDATE OF THIS POLICY

This Policy is subject to change without notice. For this reason, you are advised to look for updates from time to time.