## Introduction

ITRADERFX LTD is incorporated and registered under the laws of the Kingdom of Spain ("we", "us" or the "Company"). The Company is a Finance Management Services ("FMS") Firm. The Company obtained a license from the National Securities Market Commission of Spain (hereinafter referred to as the "CNMV"), with a Regulatory License No.: 3647. The Company does its utmost to ensure the privacy, confidentiality and security of its clients are preserved both throughout their interaction with the company and afterward, to the fullest extent achievable by the Company.

The Privacy Policy applies to all clients equally whether they are former, present or future clients of the Company.

## Collection of personal information

When clients register with the Company they acknowledge their willingness to share with the Company certain private information, which we use for the purpose of confirming the client's identity for processing with iTrader FX. As per the terms and conditions that the Clients have read and understood, the Company is acting as an intermediary whereby the Clients shall open a trading account with iTrader FX.

iTrader FX is a company incorporated under the laws of the Kingdom of Spain and has the necessary authorization and license to provide financial services to the clients. This information is collected in line with our stringent verification procedures, which are used to deter international money laundering operations and to ensure the security and safety of our customer's trading activity throughout.

Our clients undertake to supply us with true, updated and accurate information about their identity. Furthermore, they are required to state categorically that they are registering and trading on their own behalf and are not seeking at any time to act in any manner, which could be considered fraudulent nor are they seeking to impersonate any other individuals for any purposes whatsoever.

The Company data collection procedures include the collection of client's freely disclosed information as shared with the Company, in addition to the placement of cookies for the purposes of gathering data about the manner in which client's interact with the Company's website.

These tools for gathering client's information are employed for the purpose of ensuring the customer's own security and all data collected by the company is shared only with individuals within the company who are involved with the verification of customer account information for the express purpose of ensuring the customer's confidentiality and security.

The client has the option to accept or decline cookies. Most web browsers automatically accept cookies but the client can modify his browser to decline cookies if he so prefers. As a result, this may prevent the client from taking full advantage of the website.

## Sharing information with third parties

We will never disclose any private or otherwise confidential information in regards to our clients and former clients to third parties without the express, written consent of our clients, except in such specific cases in which disclosure is required by law, or is otherwise necessary in order to perform verification analysis on the client's identity for the purposes of safeguarding their account and securing their personal information.

We may also disclose the clients' personal information to third parties in order to fulfill the client's instructions or subject to the client's written consent. The confidential nature of the information shall be expressly notified to the third party. The client understands that the client's information shall be collected by the Company for the purpose of disclosing this information to the iTrader FX, as per the Company's terms and conditions and policies in place.

## Use of personal information

By registering with the Company and through the voluntary interaction by which clients undertake with the Company's products and services, the clients confirm and agree that they consent to the use of all or part of the information they supply concerning their Company's trading account, the transactions they undertake through it and the interactions, which they perform with the Company and iTrader FX. All interactions the customer undertakes with the Company and iTrader FX will be stored by the Company for the purposes of record and as such may be employed by the Company in such cases that disputes arise between clients and the Company.

From time to time the Company may contact clients whether by phone or email for market research purposes and for the purpose of offering them further information about the products and services that the Company has to offer, according to its terms and conditions. In addition, the Company may, on occasion, seek to contact clients, whether by phone or by email, for the purpose of informing them of unique promotional offerings provided by the Company to its clients. Clients consent to the receipt of such contact when they consent to the terms and conditions of use when registering with the Company.

## Security of client’s personal information

Subject to the provisions of Spain law and the requirements of the Spain Data Commissioner, the Company does its utmost to ensure the confidentiality of its clients' personal information including the implementation of data protection procedures designed to ensure client confidentiality. The Company takes the necessary measures to protect any personal information of its clients from loss, theft, misuse, and to prevent unauthorized access or disclosure, alteration or destruction. The Company further ensures that its data protection policy is regularly updated in order to ensure that client's confidential information is continually safeguarded.

## Transferring your Personal Information outside the EEA (if GDPR applies)

For Personal Information subject to the General Data Protection Regulation (EU) 2016/679 ("GDPR") we may transfer your Personal Information outside the EEA for the Permitted Purposes as described above. This may include countries that do not provide the same level of protection as the laws of your home country (for example, the laws within the EEA or the United States). We will ensure that any such international transfers are made subject to appropriate or suitable safeguards if required by the GDPR or other relevant laws.

You may contact us at any time using the contact details below if you would like further information on such safeguards. With respect to persons covered by GDPR, in case Personal Information is transferred to countries or territories outside of the European Economic Area ("EEA") that are not recognized by the European Commission as offering an adequate level of data protection, we have put in place appropriate data transfer mechanisms to ensure Personal Information is protected.

## Updating your Personal Information

If any of the Personal Information that you have provided to us changes, for example if you change your email address or if you wish to cancel any request that you have made of us, please let us know by contacting iTrader FX Customer Service through the iTrader FX website. We will not be responsible for any losses arising from any inaccurate, inauthentic, deficient or incomplete Personal Information that you provide to us.

## How long do we retain your Personal Information?

We retain your Personal Information in an identifiable form in accordance with our internal policies which establish general standards and procedures regarding the retention, handling and disposition of your Personal Information. Personal Information is retained for as long as necessary to meet legal, regulatory and business requirements. Retention periods may be extended if we are required to preserve your Personal Information in connection with litigation, investigations and proceedings.

## Further rights for persons or information covered by GDPR

With respect to EEA residents and where your Personal Information is processed by a iTrader FX Entity established in the EEA ("Covered Individuals"). If you are a Covered Individual you have a number of legal rights under GDPR in relation to the Personal Information that we hold about you. These rights include: Obtaining information regarding the processing of your personal information and access to the personal information that we hold about you.

Please note that there may be circumstances in which we are entitled to refuse requests for access to copies of personal information, (in particular, information that is subject to legal professional privilege); Requesting that we correct your personal information if it is inaccurate or incomplete; Requesting that we erase your personal information in certain circumstances. Please note that there may be circumstances where you ask us to erase your personal information but we are legally entitled to retain it; Objecting to, and requesting that we restrict, our processing of your personal information in certain circumstances.

Again, there may be circumstances where you object to, or ask us to restrict, our processing of your personal information but we are legally entitled to refuse that request; Withdrawing your consent, although in certain circumstances it may be lawful for us to continue processing without your consent if we have another legitimate reason (other than consent) for doing so.

We have designated a Data Protection Officer ("DPO") to enhance and promote compliance with and understanding of privacy and data protection principles. If you wish to do any of the above please send an email to dpo@itraderfx.com. We may request that you prove your identity by providing us with a copy of a valid means of identification in order for us to comply with our security obligations and to prevent unauthorized disclosure of data.

We reserve the right to charge you a reasonable administrative fee for any manifestly unfounded or excessive requests concerning your access to your data and for any additional copies of the Personal Information you request from us. We will consider any requests or complaints that we receive and provide you with a response in a timely manner. If you are not satisfied with our response, you may take your complaint to the relevant privacy regulator. We will provide you with details of your relevant regulator upon request.

## Opt-out

Any person wishing to opt out of further contact with the Company at any time whatsoever is entitled to do so, simply by contacting the company by email at info@itraderfx.com following the instructions included in each communication and requesting that no further contact on behalf of the company be made.

## iTrader FX Cookie Policy

### 1. What are Cookies and Web Beacons?

Cookies are pieces of data that a website transfers to a user's hard drive for record-keeping purposes. Web beacons are transparent pixel images that are used in collecting information about website usage, e-mail response and tracking. Generally, cookies may contain information about your Internet Protocol ("IP") addresses, the region or general location where your computer or device is accessing the internet, browser type, operating system and other usage information about the website or your usage of our services, including a history of the pages you view.

### 2. How we use Cookies and Web Beacons?

iTrader FX collects information from cookies and web beacons and stores it in an internal database. This information is retained in accordance with our Privacy Policy

3. **Strictly Necessary Cookies**

These cookies are necessary for the website to function and cannot be switched off in our systems. They are usually only set in response to actions made by you which amount to a request for services, such as setting your privacy preferences, logging in or filling in forms. You can configure your browser to block or alert you about these cookies, but certain areas of the site will not function properly. These cookies do not store any personal data.

4. **Performance Cookies and Web Beacons**

These cookies and web beacons allow us to count visits and traffic sources so we can measure and improve the performance of our site. They help us to know which pages are the most and least popular and see how visitors move around the site. All information that these cookies and web beacons collect is aggregated and, therefore, anonymous. If you do not allow these cookies and web beacons our aggregated statistics will not have a record of your visit.

The website uses Google Analytics, a web analytics service provided by Google, Inc. ("Google"). Google Analytics uses cookies to help analyze how you use this website. The information generated by the cookie about your use of this website (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purposes of 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. Google will not associate your IP address with any other data held by Google.

5. **Functional Cookies**

These cookies enable the website to provide enhanced functionality and personalization. They may be set by us or by third party providers whose services we have added to our pages. If you do not allow these cookies, some or all of these services may not function properly.

6. **Targeting Cookies and Web Beacons**

These cookies and web beacons may be set throughout our site by our advertising partners. They may be used by those companies to build a profile of your interests and show you relevant advertisements on other sites. They do not store personal information that could identify you directly, but are based on uniquely identifying your browser and internet device. If you do not allow these cookies and web beacons, you will experience less targeted advertising. The website does not track users when they cross to third party websites, does not provide targeted advertising to them and therefore does not respond to Do Not Track ("DNT") signals.

## Changes to Privacy Policy

The Company reserves its right to modify or amend this privacy policy at any time at its sole discretion, in particular, to reflect company and customer feedback. The Company encourages clients to frequently review this privacy policy to be informed on how their information is protected.

## Contact Information

In case of any queries or comments in relation to this privacy policy, please do not hesitate to contact us via email at info@itraderfx.com.