



# Privacy & Cookies Policy

Version: 4.0

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AFX Markets Ltd  
(FCA)



## PRIVACY & COOKIES POLICY

### Privacy Policy

AFX Markets Ltd. (“AFX UK”, “we”, “us”, “our”) trading as Tradealot™ acting as Agent for AFX Capital Markets Ltd. trading as Tradealot™ recognises your right to privacy and therefore we have established this policy to cover personal information as covered by the Data Protection Principles contained within the Data Protection Act 1998 and subsequent amendments and regulations, and non-personal information. We have registered with the Information Commission as a Data Controller with Registration Number Z3593880, for more information on Data Protection in the UK please visit [www.ico.org.uk/](http://www.ico.org.uk/). Our Policy is there so you and AFX Markets Ltd. have a clear understanding of when and how information that you or your computer provides will be used. The provisions of this notice apply to former clients, current clients, and applicants. If you have any questions regarding its content and the effect on your information, please feel free to contact us using our live chat function on [www.tradealot.eu](http://www.tradealot.eu) or the appropriate contact details under ‘contact us’.

### Personal Information

Personal Information provided by you to AFX Markets Ltd. by opening and/or updating an Account or whilst placing Orders to enter into Contracts, may be processed by AFX Markets Ltd. for the purposes of: performing our obligations under the terms and conditions and all linked documentation, regulatory requirements, administering the relationship with you and analysing, improving and developing the trade products and services we offer. This includes AFX Markets Ltd. providing to AFX Capital Markets Ltd. your details and your trades for them to transmit to a Trade Repositories as required under the European Markets Infrastructure Regulation (EMIR) and you recognise and accept that such Trade Repositories may share information for the purposes of netting transactions and all purposes envisaged under EMIR.

Data provided under the above conditions may be disclosed to AFX Capital Markets Ltd. to enable AFX Markets Ltd. to complete its role as Agent and for the purposes of enabling the execution of trades by AFX Capital Markets Ltd. The personal information 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 a supplier. By submitting your personal details you agree to us transferring, processing and storing your personal information in this way.

Unless you require AFX Markets Ltd. not to do so, personal information may also be used by AFX Markets Ltd. (and shared with the parties indicated above, as necessary and other carefully selected third parties) for marketing or market research purposes. To opt out of marketing material please log in to MyAccount to alter your preferences. If you have any problems please feel free to contact us using our live chat function on [www.tradealot.eu](http://www.tradealot.eu) or the appropriate contact details under contact us.

AFX Markets Ltd. has security procedures covering the storage and disclosure of all of our Client’s personal information to prevent unauthorised access and to comply with legal and regulatory obligations. Before transferring personal data to service providers, other suppliers or parties for processing or other purposes, AFX Markets Ltd. shall ensure that adequate contractual arrangements complying with applicable legal standards are in place to protect the confidentiality of the information.

You may require AFX Markets Ltd. to provide details of the personal information held about you, the purposes for which the information is processed and the persons or class of persons to whom the information is disclosed. AFX Markets Ltd. may charge a fee to provide these details to cover the cost of validating your application, tracing, retrieving, reviewing and copying any material requested, the amount of which is available upon request. You may also require AFX Markets Ltd. to correct, delete and/or block personal information from further processing if that information is inaccurate. This can be done by contacting us using our live chat function on [www.tradealot.eu](http://www.tradealot.eu) or the appropriate contact details under ‘contact us’.

Subject to the foregoing, neither party may disclose to any person any information relating to the business, investments, finances or other matters of a confidential nature of the other party of which it may come into possession of in connection with this Agreement and its performance by the other party, and each party shall use all reasonable endeavours to prevent such disclosure. Notwithstanding the above, each party (the “Disclosing Party”) may disclose information about the other party, this Agreement, the Account and any trade thereon as the Disclosing Party may be required by any law, rule or regulatory requirement, law enforcement or tax authority or as the Disclosing Party reasonably believes to be necessary to properly perform its obligations under this Agreement or to exercise and enforce its rights there under (including, without limitation, as set forth in Section 16.4 of AFX Capital Markets Ltd. terms of business) without prior notice to the other party.

You do not have to provide us with any of the personal information requested by AFX Markets Ltd. However, should you opt not to provide us with the information requested, AFX Markets Ltd. may be unable to open an account for you, where the information is requested at application stage, or may cease to be able to provide you with any other further services, information or assistance you have sought. This decision will not be taken lightly and will be done based on regulatory requirements, standard industry practice and based on the risk involved to AFX Markets Ltd.

### COOKIES POLICY

#### What Are Cookies & Why Do Websites Use Them?

Whenever you search the web or visit websites your browser stores “cookies”. A cookie, also known as an HTTP cookie, web cookie, or

browser cookie, and is a piece of data (text file) sent by a website to your browser (often including a unique identifier) and is stored on your device's browser which is subsequently confirmed by being sent back to the website unchanged by your browser. Each website you use may send cookies to your computer, if your browser settings allow for this. However, to protect your privacy your browser will only permit a website to access the cookies it has already sent to you and not cookies sent by other websites.

Cookies are used for a variety of purposes for example to enable websites to “remember” where on the site your browser has been during that visit (unique session identifier) and depending on the cookie type, on your return (personalisation/tracking). Cookies allow you to access secured information, conduct secured transactions, and take advantage of promotional opportunities. Cookies are designed to help you have a better user experience when using the web and this is no different within our website. We use the information provided by cookies in the same way, for example whilst you are logged into your account to maintain your account preferences and other account specific information, to improve our site content or to monitor where you became aware of our site for possible marketing purposes.

AFX Markets Ltd. uses two types of cookies; Campaign/Performance cookies used to monitor which online campaign you visited the website through e.g. a banner on x website and these expire after 3 days and Session/Functionality cookies used to save the session configuration of a registered user for example language and as the name suggests lasts for the length of your session on the site. It is not currently possible to limit the cookies we use through our website other than through your browser. To do so, please visit [www.aboutcookies.org](http://www.aboutcookies.org) for more information and instructions on how to manage cookies. Limiting cookies may affect how our website works for you. We may look to add targeting/advertising cookies in the future. Due to technological advances the cookies we use may vary over time, however, any that will increase substantially the duration the cookie remains on your device will result in an amendment in this policy. Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this privacy statement.

### **Controlling What Data Is Collected Through Cookies On Our (and other) Websites**

You can control the cookies your browser accepts by altering the settings of your browser. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer, or give you the option to accept or decline each cookie before it is placed. However, rejecting cookies may reduce your access to parts of our website, including account information found behind the “MyAccount” log in. If you do not wish to accept

cookies, please review your Internet browser (Internet Explorer, Firefox, Google Chrome, etc.) manual/help section to find out how to either block all cookies or receive a warning before a cookie is stored on your computer. You may wish to find out more information regarding cookies at visit [www.aboutcookies.org](http://www.aboutcookies.org).

### **Third Party Cookies on AFX Markets Ltd. Pages**

During your visits to AFX Markets Ltd. websites, you may notice that some cookies are not related to AFX Markets Ltd. or AFX Markets Ltd.'s Affiliates. When you visit a page with content embedded from, for example, YouTube or LinkedIn, you may be presented with cookies from these websites. AFX Markets Ltd. does not control the distribution of these cookies. You should check the third party websites for more information about its privacy policy and use of cookies. Different 3<sup>rd</sup> party cookies can exist, Due to the nature of technology these may change; however, we will monitor this and update this policy at regular intervals:

**Adform** – a cloud technology built for agencies and advertisers, who want to make display advertising the best performance channel by use of personalised targeting, real time bidding and rich media. The privacy policy can be found [here](#).

**Boldchat** – a business chat application enabling visitor monitoring owned by LogMeIn Inc. The privacy policy can be found [here](#).

**Google Analytics** is used to count the number of people who use the site, traffic type, the country the visitor is from, to analyse how they use it and as site verification. The privacy policy can be found [here](#).

**Google Tag Manager** – makes it easy to add and update website tags. The privacy policy can be found [here](#).

**Revenue Hits** – technology aimed at Contextual and Geo targeted Ad serving. The privacy policy can be found [here](#).

**Stat Hat** – creation of viewing stats – The privacy policy can be found [here](#).

### **Security & Protection**

AFX Markets Ltd. takes security issues very seriously. We take all reasonable steps to protect your Personal Data, including maintaining strict security standards and procedures and using leading security technologies. Using advanced encryption technology to ensure privacy and security over the Internet.

Communication through our website is secured in various forms including but not exclusively: encryption using Secure Socket Layer SSL technology (Secure Socket Layer), WCF technology on application forms (technology enabling restriction of access by IP address),



SQL server protection, EAP, TTLS, TLS, and PEAP. Passwords are encoded; making sure that only you know your password.

If you communicate with the Company by e-mail, you should note that the security of Internet e-mail is uncertain. By sending confidential e-mail messages which are not encrypted you accept the risks of such uncertainty and possible lack of confidentiality over the Internet. The Internet is not 100% safe and someone may be able to intercept and read your details.

### **Employees**

Anyone who deals with clients' personal information in the name of AFX Markets Ltd. is aware of the obligations placed on them through this policy and other internal requirements including all affiliates, employees, appointed representatives, tied agents, contractors or any person directly or indirectly linked to us by control.

### **Raising a Concern**

Should you have any concerns that AFX Markets Ltd has not met the requirements of this policy we encourage you to inform us as soon as possible. Such concerns will be raised as a dispute under our complaints procedure and will be fully responded to in accordance with

that policy. Please do not be afraid to raise a concern regarding an individual staff member or the company as a whole as your feedback ensures the protection of all our clients and the reputation of AFX Markets Ltd. For more information on raising your concern, please see our complaints procedure at [www.tradealot.eu](http://www.tradealot.eu).

If you are not satisfied with our response, you can telephone the Information Commissioner's information and enquiries line on +44 (0) 303 123 1113 or +44 (0) 1625 545745, or visit [www.ico.org.uk/complaints/handling](http://www.ico.org.uk/complaints/handling) for more information on whether the Information Commissioner's Office can look into your concerns.

AFX Markets Ltd. may make changes to this Privacy and Cookies Policy from time to time for legal, regulatory or for enabling further clarification. Should this happen AFX Markets Ltd. will notify you of such changes by placing an updated version of this policy on the website. Please note AFX Markets Ltd. is not responsible for providing individual notifications of changes. You are responsible for regularly reviewing this policy. If you use this website or other service we provide to you following any changes taking affect you shall be classed as agreeing to those changes.