



IFC IFC Investments
Cyprus Ltd

Registered office: 242 Arch.Makariou III
P. LORDOS CENTRE, BLOCK A, 2nd floor, Office 203
3105, Limassol, Cyprus
Tel: +357 25340396, Fax: +357 25340310, email: info@ifc-center.com
www.ifc-center.com

Privacy and Cookies Policy

IFC INVESTMENTS LIMITED is a Company regulated by the Cyprus Securities and Exchange Commission, CySEC, (www.cysec.gov.cy), under the license number 327/16. The Offices of IFC INVESTMENTS LIMITED are located at Arch.Makariou III, 242 P. LORDOS CENTRE, BLOCK A, 2nd floor, Flat/Office 203, 3105, Limassol, Cyprus (hereinafter: “We”, “Us”, the “Company”)

To help us to understand the needs of our customers and improve our service, data collected on our website at www.ifc-center.com will be held on our secure database. All customer data stored on our servers are stored in compliance with statutory requirements. We will never make this data available to any other company or third party unless as stated in this Privacy Policy further below.

This Policy sets the Company’s obligations regarding the collection, processing, transfer, storage, and disposal of personal data relating to clients or potential clients, and other third parties. The procedures and principles set out herein must be followed at all times by the Company, its employees, agents, contractors, or other parties working on behalf of the Company.

The Company is committed to protect the client’s Privacy by handling their personal data in an open and transparent manner therefore; we process all personal data in accordance with the General Data Protection Regulation.

Our Commitment to You

We understand the importance of maintaining the confidentiality and privacy of your information. By entrusting us with your information, we would like to assure you of our commitment to keep such information private. We have taken reasonable steps to protect the confidentiality, security, and integrity of your Information.

The Company’s commitment applies to all individuals whose personal data it may process.

“Personal Data” means any information relating to an identified or identifiable natural person. The Company acts as controller in relation to such personal data.

‘data controller’: means the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of personal data; where the purposes and means of such processing are determined by Union or Member State law, the controller or the specific criteria for its nomination may be provided for by Union or Member State law;

Collection of information

When you create an account with the Company, we require you to provide your first and last name, e-mail address, details about your financial status, your residential address, phone number, date of birth, a copy of your national identity card or passport or driving licence, a copy of a recent utility bill/bank statement (or

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similar) as evidence of your residential address, credit card or bank card details, Tax residence and Tax Identification Number, profession and employment details, knowledge and experience in trading, risk tolerance and risk profile and other information we may consider necessary to our functions and activities and in order to be in a position and be permitted to provide our services to you.

If the Company requests you to provide to it personal data and you fail to do so the Company may not be in a position to provide a service and/or enter into an agreement with you, in which case it will inform you accordingly.

The abovementioned data are collected by the Company when you are going to open a trading account with the Company. It is required by the AML Law (the Prevention and Suppression of Money laundering and Terrorist Financing Law of 2007 L. 188(I)/2007-2018 as amended from time to time) and CySEC's AML Directive that the Company collects the necessary data for verifying your identity, constructing your economic profile, monitoring your account and verifying the source of funds (when it is necessary). Additionally, we use this data to set up and administer your trading account, provide technical and customer support.

If you are a corporate client we are required to collect information related to the legal entity (e.g. corporate and constitutional documents), additional personal information on the shareholders, directors and other officers that we deem as necessary in order to be compliant with our legal and regulatory requirements.

We may record any communications, electronic, by telephone, in person or otherwise, that we have with you in relation to the services we provide to you and our relationship with you. These recordings will be our sole property and will constitute evidence of the communications between us. It should be note that we are obliged by Law 87(I)/2017 to keep records of all telephone conversations and electronic communications that are related to transactions concluded or intended to result in transactions when dealing on own account and the provision of client order services that relate to the reception, transmission and execution of client orders.

We may collect your Information directly from you (in your completed Account Opening Application Form or other way) before you become our Client or from other persons including, for example, credit reference agencies, fraud prevention agencies, banks, other financial institutions, third authentication service providers and the providers of public registers. This information includes, but is not limited to, personal details such as name, address, date of birth, contact details, payment details, including credit card, debit card and bank account details, and other necessary financial information such as information about your income, wealth, assets and personal investment preferences and targets.

We may also collect your Information in regards to your use of our website(s), such as pages visited, frequency, duration of visit and trading activities.

From time to time we may also request further information to help us improve our Service to you (if you are our Client) or our activities (if you are our Provider for Trading Data) under our relevant Agreement, as the case may be, or comply with Applicable Regulations.



Use of the Information

Security

We endeavour to protect the information you provide and ensure that your privacy is protected and there are strict security procedures that have been put in place. Our servers can only ever be accessed by authorised personnel.

While we will use all reasonable efforts to safeguard your information, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data transferred from you, or to you via the internet.

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 immediately the changes on our website and notify you of the changes. In addition, we 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.

Information Collection

When you access our website we collect non-identifiable information in the following ways:

When you access our website we collect information that your browser sends whenever you visit a website or online service ("**Log Data**"). This Log Data may include, but is not limited to, your computer's Internet Protocol address, browser type, the web page you were visiting before you came to the Site and information you search for on the Site and the Service. In addition, if you access the Service via a mobile device, we may collect a PushID, subject to your consent as indicated by you in the mobile application, and a Mobile IP.

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.



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How we use cookies?

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.

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.

Cookies Settings

If you don't want to receive certain categories of cookies on our website, you can opt-out of them. We will need to set a cookie so that we can remember your choices when you next visit the website from the same browser. At the present time it is not technically possible for us to allow you to carry your settings with you between your browsers and devices so you will need to change these settings from each browser you use.

Please also be aware that we make every effort to respect your choices, however, there is the possibility that not all cookies will be captured. If this is a concern, then we would recommend that you change your cookie settings via your browser; your browser help function will tell you how.

Note: most of our website may work without cookies, but you will lose some features and functionality if you choose to disable cookies.

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.

How We Use Information



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We use your information in order to (i) monitor and analyze use of the website and for the technical administration of the website, (ii) improve the website, (iii) generate and derive useful data and information concerning the interests, characteristics, use and behavior of our visitors.

Aggregate Information and Non-Identifying Information.

We may share aggregated information, including queries and offers generated as a result of your use of the website, that includes non-identifying information and Log Data, with third parties for industry analysis, demographic profiling, other commercial purposes and to deliver targeted advertising about products and services. Any aggregated information shared in these contexts will not contain any personal information.

Compliance with Laws and Law Enforcement.

We cooperate with government and law enforcement officials and private parties to enforce and comply with the law. The Company reserves the right to disclose personal information to third parties where required by law, regulatory, law enforcement or other government authority of a competent jurisdiction in order to protect our rights and/or to comply with such legal proceedings and/or as this is stated in the Privacy Policy further below.

Business Transfers.

We may sell, transfer or otherwise share some or all of our assets, including among others your Personal Information and Log Data, in connection with a merger, acquisition, reorganization or sale of all or substantially all of our shares or assets, or in the event of our bankruptcy.

In addition, we may post additional ancillary privacy notices with respect to specific services.

If you are our client or you apply to become our client, we will use, store, process and handle your Personal Information (in case you are a natural person) in connection with the furthering of the Agreement between us, in accordance to the General Data Protection Regulation (hereinafter "GDPR") or any other applicable legislation.

Your Information (not in the public domain or already possessed by us without a duty of confidentiality) which we hold is to be treated by us as confidential and will not be used for any purpose other than in connection with the provision, administration and improvement of our Services to you or the furthering of our Agreement between us, establishing and managing your account or a relationship between us, reviewing your on-going needs, enhancing customer service and products, giving you on-going information or opportunities that we believe may be relevant to you, improving our relationship, anti-money laundering and due diligence checks, for research and statistical purposes and for marketing purposes (according to the Agreement between us), as applicable.

By entering an Agreement with us (to become our Client), you will be consenting to the transmittal of your Personal Information outside the European Economic Area, according to the provisions of the GDPR. We may transfer your personal information outside the European Economic Area. If we will make such a transfer, we will ensure that the transfer is lawful and that there are appropriate security arrangements in place to safeguard your personal data as provided by Applicable Regulations.

Disclosure of Information

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Under the Agreement between us, we have the right to disclose Your Information (including recordings and documents of a confidential nature, card details) in certain circumstances. According to the Agreement between us, Your Information may be disclosed:

- (a) where required by law or a court order by a competent Court;
- (b) where requested by our Supervisor (the Cyprus Securities and Exchange Commission) or any other regulatory authority having control or jurisdiction over us or you or our associates or in whose territory we have Clients or Providers, as applicable;
- (c) to relevant authorities to investigate or prevent fraud, money laundering or other illegal activity;
- (d) such an extent as reasonably required so as to execute your Instructions or Orders and for purposes ancillary to the provision of our Services to you as our Client;
- (e) to credit reference and fraud prevention agencies, third authentication service providers, banks and other financial institutions for credit checking, fraud prevention, anti-money laundering purposes, identification or due diligence checks of you. To do so they may check the details you supplied against any particulars on any database (public or otherwise) to which they have access. They may also use your details in the future to assist other companies for verification purposes. A record of the search will be retained by us;
- (f) to our professional advisors provided that in each case the relevant professional shall be informed about the confidential nature of such information and commit to the confidentiality herein obligations as well;
- (g) to other service providers who create, maintain or process databases (whether electronic or not), offer record keeping services, email transmission services, messaging services or similar services which aim to assist us collect, storage, process and use Your Information or get in touch with you or improve the provision of our Services or activities under the Agreement between us;
- (h) to a Trade Repository or similar under the Regulation (EU) No 648/2012 of the European Parliament and of the Council of 4 July 2012 on OTC derivatives, central counterparties (CCPs) and trade repositories (TRs) (EMIR);
- (i) 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;
- (j) to market research call centres that provide telephone or email surveys with the purpose to improve our Services or activities, but only your contact details;
- (k) 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;
- (l) at your request or with your consent;
- (m) to our Affiliates or any other company in our group;
- (n) to our employees so as to exercise their duties to further the Agreement between us.
- (o) To our successors or assignees or transferees or buyers as stated in the Client Agreement.
- (p) to the Inland Revenue in Cyprus, in relation to US taxpayers which will in turn report this information to the IRS of the US according to the Foreign Account Tax Compliance Act (FATCA) of the USA and the relevant intergovernmental agreement between Cyprus and the US

Where you are a natural person and our use of your personal information requires your consent, we will request you to provide your consent freely, specifically, after being informed and unambiguously by a statement or by a clear affirmative action, signifying your agreement to the processing of personal data relating to you.

We will require you to provide your consent in an intelligible and easily accessible form, using clear and plain language in such a case, we will maintain records of you having provided your consent.

If we rely on your consent as our legal basis for processing any of your personal information, you have the right to withdraw that consent at any time by contacting us using the contact details set out in this privacy policy.



The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

Duration of keeping information

We will not keep your information for any longer than is required. In many cases, information must be kept for considerable periods of time. Retention periods will be determined taking into account the type of information that is collected and the purpose for which it is collected, our statutory obligations to maintain information, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused and no longer required information at the earliest reasonable time.

For example, we are subject to investment services and anti-money laundering laws which require us to retain copies and evidence of the actions taken by us in regard to your identity verification, sources of incomes and wealth, monitoring of your transactions, telephone, chat and email communications, orders and trades history, handling of your complaints and records that can demonstrate that we have acted in line with regulatory code of conduct throughout the business relationship. These records must be maintained for a period of five years after our business relationship with you has ended or even longer if we are asked by our Regulators.

Where you have opted out of receiving marketing communications we will hold your details on our suppression list so that we know you do not want to receive these communications.

Your rights as a data subject

Right of access – you have the right to request from us to provide you with a copy of the personal data that we hold about you.

Right of rectification – you have a right to request from us to correct the personal data that we holds about you that is inaccurate or incomplete.

Right to be forgotten – you have a right to request from us in certain circumstances to erase your personal data from our records. In case that these circumstances apply to your case and provided that no exception to this obligation applies (e.g. where we are obliged to store your personal data in compliance with a legal obligation under Cypriot or EU law), the Company acting as your controller will erase your personal data from its records.

Right to restriction of processing – you have a right to request from us where certain conditions apply, to restrict the processing of your personal data.

Right of portability – you have the right to request from us where certain conditions apply, to have the data we hold about you transferred to another organisation. Where these conditions apply the Company will transfer your personal data to another organisation.

Right to object – you have the right to object on grounds relating to your particular situation, to certain types of processing such as direct marketing or where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on IFC Investments Cyprus Ltd is regulated by the Cyprus Securities and Exchange Commission (CIF License no. 327/16)



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this ground as 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 and freedoms.

Request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.

Right to 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 services to you. We will advise you if this is the case at the time you withdraw your consent.

In respect to the aforementioned rights, we will respond to requests for personal data and, where applicable, will correct, amend or delete your personal data. You can send the relevant request to the following e-mail address:

dpo@ifc-center.com

We may charge you a reasonable fee when a request is manifestly unfounded, excessive or repetitive, or we receive a request to provide further copies of the same data. In this case we will send you a fee request which you will have to accept prior to us processing your request. Alternatively, we may refuse to comply with your request in these circumstances.

Scope of the Policy and Third Party Sites

This policy applies only to us and this website. We do not exercise control over other websites, or over banners or links from within our website. These other websites, banners or links may place their own cookies or other files on your computer, collect data or solicit personal information from you subject to such third party's privacy policy. We encourage you to read the privacy policies and other terms of such third parties before accessing or using them.

How to contact us about this Policy or making a complaint

We welcome your views about our website and our privacy policy. If you have any queries about the contents of this Policy, or wish to inform us of a change or correction to your personal data, would like a copy of the data we collect on you or would like to raise a complaint or comment, please contact us using the details set out below:

Data Protection Officer

E-mail: dpo@ifc-center.com

We try to respond to your request within one month of receipt of the request. That period may be extended by two further months where necessary, taking into account the complexity and number of the requests. The



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Company shall inform the data subject of any such extensions within one month of receipt of the request, together with the reason for the delay. Where the data subject makes the request by electronic form means, the information shall be provided by electronic means where possible, unless otherwise requested by the data subject. In case that your request takes us longer than one month we will notify you accordingly and keep you updated. In this respect it should be noted that the information to be provided as a result of exercising your right shall be provided free of charge. Nonetheless and where requests are manifestly unfounded or excessive, in particular because of their repetitive character, the Company may either:

(a) charge a reasonable fee taking into account the administrative costs of providing the information or communication or taking the action requested;

or (b) refuse to act on the request

If you are not satisfied with our response to your complaint and/or your request was not handled within the timeframes specified, you have the right to lodge a complaint with our supervisory authority, the Cyprus Data Protection Commissioner. Alternatively, you also have the right to lodge a complaint with the data protection authority of your country of residence.

You can find information about how to contact the Cyprus Data Protection Commissioner on the following website: <http://www.dataprotection.gov.cy/>