



FXopen®
when money makes money

Privacy Policy

April 2021

V.4

This Privacy Policy sets out the way FXOPEN EU LTD (ex. AMB Prime Ltd) (hereinafter “the Company”) collects, uses and manages personal information from its visitors, potential and active clients and clients who have terminated their business relationship with the Company who are accessing or using the Company’s website(s) and mobile applications. The Company is committed to safeguard the information / Personal Data it collects, uses and/or holds in accordance with the provisions of the European General Data Protection Regulation EU 2016/679 (hereinafter ‘GDPR’) and any regulations of the Republic of Cyprus which implement or supplement the GDPR.

Personal Information

In order to receive more information, register for a demo account, open a trading account with us or for any other business relationship, you are requested to complete the Application Form. By completing the Application Form and providing your personal information, you enable us to evaluate the application and comply with laws and regulations governing the provision of financial services. The same information will be used by the Company to contact you regarding the offered services.

The Personal Data collected by the Company might include, but not limited to:

- Personal information you provide to us on applications and other forms, such as your name, surname, address, e-mail address, phone number, date of birth, gender, occupation and employment details;
- Financial information such as your income, assets and net worth;
- IP address
- Bank account, e-wallets and credit card details, tax information
- Documents that you provide to us to verify your identity, such as your passport/identity card, utility bills and/or bank statement or your company incorporation details.

The Company is obligated by the regulations of Cyprus Securities and Exchange Commission to keep your Personal Data on record for a period of five years which is calculated after the execution of the transactions or the termination of the business relationship or even longer if it is requested by the CySEC.

Use of Personal Data

The Company collects and process Personal Data which are required for the evaluation. Establishment and maintenance of the contractual relationship between the Company and the Client and in order to comply with the applicable aforementioned data protection legislation and regulations governing the provision of investment services. In some cases, the Company may also process the Client’s Personal Data to pursue its legitimate interests or those of third parties,

provided that the Clients' interests and fundamental rights are not overridden by those of the Company or the third party.

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

- to confirm/verify your identity;
- to assess your appropriateness/suitability to the products and services we provide;
- to process your transactions;
- to manage the account the Client holds with the Company;
- 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 analyse statistical data to enable us to provide you with better products and/or services;
- to enhance the security controls of the Company's networks and systems;
- to identify, assess, mitigate, prevent and investigate fraudulent activity of any kind that is forbidden by the relevant legislation;
- to defend possible legal claims;

The Company needs to comply with the Anti-money Laundering regulations, therefore hard copies and/or in electronic format copies shall be retained as evidence. Also the measures that are taken by the Company in regards to your identity verification, source of income and wealth, monitoring of your transactions, telephone/text/e-mail communication, and transaction history must be kept to be able for the Company to demonstrate to the regulator that has acted in accordance with the legislation.

The Company will ask for the Client's consent in regards to the provision of marketing information in relation to the products and services offered. The Client consent is provided by signing the Client agreement between the contractual parties.

The Client may withdraw such consent at any given time by sending an email to dpo@fxopen.eu.

The Company shall not disclose to a third party, any of its clients' confidential information unless required to do so by a regulatory authority of a competent jurisdiction; such disclosure shall occur on a 'need-to-know' basis, unless otherwise instructed by a regulatory authority. Under such circumstances, the Company shall expressly inform the third party regarding the confidential nature of the information.

Cookies

➤ What are Cookies?

Cookies are small text files, given ID tags that are stored on your computer's browser directory or program data subfolders. Cookies are created when you use your browser to visit a website that uses cookies to keep track of your movements within the site, help you resume where you left off, remember your registered login, theme selection, preferences, and other customization functions. The website stores a corresponding file (with same ID tag) to the one they set in your browser and in this file they can track and keep information on your movements within the site and any information you may have voluntarily given while visiting the website, such as email address.

Cookies are often indispensable for websites that have huge databases, need logins, have customizable themes, other advanced features.

Cookies usually don't contain much information except for the URL of the website that created the cookie, the duration of the cookie's abilities and effects, and a random number. Due to the little amount of information a cookie contains, it usually cannot be used to reveal your identity or personally identifying information.

There are two categories of cookies depending on its provenance:

1. First-party cookies — the cookies that are put on your device directly by our website when you are visiting it;
2. Third-party cookies — these are the cookies that are placed on your device, not by the website you are visiting, but by a third party like an advertiser or an analytic system. Our website may include cookies from such third-parties.

The cookies may be also divided depending on its duration as:

- session cookies, and
- persistent cookies.

Session cookies are created temporarily in your browser's subfolder while you are visiting a website. Once you leave the site, the session cookie is deleted.

Persistent cookie files remain in your browser's subfolder and are activated again once you visit the website that created that particular cookie. A persistent cookie remains in the browser's subfolder until you erase them or your browser does, depending on the cookie's expiration date.

We use cookies (i) to track your online activity in order to provide the functionality you need to browse our site correctly, (ii) to identify which pages and services are the most interested to you, (iii) to measure number of visitors and (iv) to target you with highly specific ads.

The cookies that we use can't execute code or deliver any viruses. The cookies that we use don't allow us to (i) store any personally identifiable information such as passwords; (ii) access any other information stored on your computer; (iii) compromise the security of your device(s).

The Company does not use cookies to collect personal information about you and from your device – the cookies that we use only collect anonymous information to optimize our services and do not

collect personal information. None of gathered information is able to identify you separately or collectively.

➤ *What types of cookies we use?*

- (a) Strictly necessary cookies. These cookies are essential to be able to assess features of our website and use its services. Without such cookies, our website is unable to provide its basic functions to you (signing in to your account or accessing features of the website are among them);
- (b) Performance cookies (also known as “Statistics cookies”). Such cookies are responsible for gathering data about your previous experience when interacting with our website (e.g. which pages you visited, which links you clicked on, numbers of visitors, technical information, if there are any error messages on web pages when loading);
- (c) Targeting cookies (also known as “Marketing cookies”). They intended to collect information from and about you, your device to display advertisements to you based on relevant topics, which may be of interest to you (e.g. banner ads). These cookies can share that information with other organizations or advertisers. These are persistent cookies and almost always of third-party provenance;
- (d) Functionality cookies (also known as “Preferences cookies”). These cookies are necessary to remember choices you have made previously on our website (e.g. language preferences you’ve chosen).

➤ *List of cookies we use:*

Cookie name	Description	Type of cookie
ASP.NET_SessionId	Used to maintain a user session.	Strictly Necessary
RequestVerificationToken	An anti-forgery cookie. It is designed to prevent CSRF attacks.	Strictly Necessary
AspNet.ApplicationCookie	Used to identify user sessions (a session relates to a user, and begins when you log in and ends when you log out).	Strictly Necessary
aspnet	Is used to identify user sessions (a session relates to a user, and begins when you log in and ends when you log out).	Strictly Necessary
ga	Used to distinguish unique users. There are a few of such cookies used on the website.	Performance
gid	It stores and update an unique value for each page visited and is used to count and track page views.	Performance



gat_UA	It is used to limit the amount of data recorded by Google on high traffic volume websites.	Performance
cfduid	Used to speed up page load times, to override any security restrictions based on the IP address and from where the visitor is coming from and detect malicious visitors.	Performance
sg_cookies	Used to improve the usability of website.	Performance
gcl_au	Used for experimenting with advertisement efficiency across websites using their services.	Targeting
NID	These cookies are used for targeted advertising. Contains an unique ID Google uses to remember your preferences and other information (e.g. preferred language, how many search results you wish to have shown per page).	Targeting
DV	These cookies are used for targeted advertising. Same as NID.	Targeting
1P_JAR	Used by Google Ads to gather website statistics, track conversion rates and show targeted ads to the user in the Google Display in/or Search Network.	Targeting
UrlMarkers	Gather targeting information from the website for subsequent internal marketing analysis.	Targeting
uetvid	Used to engage with a user that has previously visited the website and to present relevant advertisements. Used by Google Ads.	Targeting
uetsid	Used to engage with a user that has previously visited the website and to present relevant advertisements. Used by Bing Ads.	Targeting
ym_uid	Gather depersonalized information about website's traffic. The statistics include the	Targeting



	number of users, traffic sources, and user behavior on site pages.	
ym_isad	Used to determine whether a user has ad-blockers.	Targeting
fbp	Used to distinguish and keep track unique users.	Targeting
ym_d	Stores the data of the user's first site session.	Targeting
fbp	Used to display advertisement in the social network Facebook and measure the performance of our advertising on Facebook.	Targeting
lang	Used to store language preferences, potentially to serve up content in the stored language for a frontend of the website.	Functionality
contact_user	Intended for identification of user for subsequent communication in one of messengers with support team.	Functionality
my.fxopen.eu_Culture	Used to signed in referral identification.	Functionality
Fxo agent	Intended for signification of connection between referral and his agent within our referral program.	Functionality
Visitor statistics	Contains an ID of a client area attendance. Intended for agent within our referral program. Shows statistics of websites from which referrals are coming from for signed in agent.	Functionality
CMSPreferredCulture	Analog of "lang" cookie. Intended for currently supporting previous versions of client area.	Functionality
Accounts_Menu_Visibility	Used for showing menu with client's personal information of the client area after a user signed in.	Functionality

cookiesmsg	Intended for showing a message about using of cookies on the website and a possibility to choose a cookie to be shared with our website.	Functionality
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➤ *How to manage your cookies preferences*

Our website issues cookies upon landing. We fully respect your privacy and provide you with the relevant information and tools so that you can manage your cookie preferences.

You can chose to accept (all or particular groups) or decline cookies by marking the respective check-box on the notifying pop-up cookies banner. Please note that when certain or all cookies switched off, some areas of our website and services might not be available to you.

You can also manage cookies by changing cookie settings in your browser to refuse cookies If you want to delete the cookies downloaded to your device when browsing our website, you can use your browser settings. Please see the links with following instructions for the most popular browsers:

- [Google Chrome;](#)
- [Apple Safari;](#)
- [Microsoft Edge;](#)
- [Mozilla Firefox;](#)
- [Opera.](#)

Disclosure of Personal Data

Any personal information is treated as confidential and may be shared within the Company and its partners to meet its contractual and legal obligations. Contractual relationships exist with the Company's partners aiming to safeguard the Client's personal data in accordance with the Data Protection Legislation. Our company partners maintain the privacy of your information to the same extent the Company does in accordance with the policy. Nonaffiliated companies that assist the Company in providing services to you are required to maintain the confidentiality of such information and to use your personal information only in

the course of providing such services for the purposes that the Company dictates and within the ambit of the applicable law.

Recipients of Personal Data may be for example:

- technological experts that appointed by the Company to support the smooth operation of our systems
- platform providers

- payment service providers/credit institutions for facilitating the incoming and outgoing payments of the Clients
- governmental authorities and regulatory bodies
- fraud prevention agencies, third party authentication service providers, verification/screening service providers
- data reporting service providers to meet our regulatory obligations
- external consultants
- Data Protection Officer of the Company who may be outsourced

Transfer Personal Data outside the European Economic Area

The Company's aim is to safeguard Personal Data when these are to be transferred outside the European Economic Area. According to GDPR, Personal Data can be transferred outside the European Economic Area if adequate protective measures established.

The Company takes appropriate protective measures if Personal Data are disclosed to a third party. The third parties that the Company may transmit Personal Data shall comply with the GDPR or the equivalent legislation of their home member state.

Personal Data Rights

The Client has the following rights in respect of his/her Personal Data in accordance with the GDPR:

- **Right of Access:** The Client has the right to be informed whether the Company is processing his/her Personal Data and if so, to provide the Client with a copy of that Data.
- **Right to rectification:** The Client can request to rectify his/her Personal Data in order to correct or complete the provided Personal Data.
- **Right to Erasure:** The Client can request to delete/remove his/her Personal Data under certain circumstances, for instance if his/her consent has been withdrawn.
- **Right to Restrict Processing:** The Client can request from the Company to restrict the processing of his/her Personal Data if it is not accurate, it has been used unlawfully or it is
- not relevant anymore but wish not to be deleted for any reason and waiting for the Company's confirmation to stop using his/her Personal Data.
- **Right to portability:** The Client can request to obtain his/her Personal Data in a readable format.
- **Right to Stop Processing:** The Client can request from the Company to stop processing his/her Personal Data, and the Company will do so if a) the Company cannot demonstrate compelling legitimate grounds for the processing or b) the Company is processing Client's Personal Data for marketing purposes.

- **Right to Withdraw Consent:** Withdraw consent at any time where we are relying on consent to process your Personal Data
- **Right to complain:** If the Client has grounds to believe that the Company does not appropriate use his/her Personal Data, can submit a complaint to the Office of the Commissioner for Personal Data Protection.

The Client can exercise any of the above rights by contacting the Company through email at dpo@fxopen.eu or by post at postal address: 38, Spyrou Kyprianou Str, CCS BLDG - Office N101, CY-4154 Limassol, Cyprus.

Security

The privacy and confidentiality of your personal information is of fundamental importance to us. We take all appropriate security measures to protect against unauthorised access to or unauthorised alteration, disclosure or destruction of data and personal information.

We restrict access to personal information to employees who need to know the specific information in order to operate, develop or improve our services. These individuals are bound by confidentiality and will be subject to penalties if they fail to meet these obligations.

Also the Personal Data can be shared only with the parties set out in the aforementioned Section of Disclosure of Personal Data.

The Personal Data that the Client provides in connection with opening an account (appropriateness test) with the Company are highly protected. This information can be accessed by the Client using his/her selected password. This password must be careful kept by the Client and not be shared with any third party.

In addition this information is safely stored in the Company's servers that only authorized personnel have access to it through access rights. The Company encrypts all this information to prevent unauthorized parties from viewing or access such information.

Changes of Privacy Policy

The Company reserves the right to change or amend the Privacy policy without further notice to you, provided that the changes do not significantly reduce your rights under this Policy. If we make material changes to this policy, we will notify you by email or by means of a notice on our home page or by changing the version of the document including the date of the update which will be visible to the first page of this document. The latest and prevailing version of this Policy will at all times be available at www.fxopen.eu. Any revised Policy will be effective immediately upon posting on our Web Site.

Legal Disclaimer

The Company reserves the right to disclose your personally identifiable information as required by rules and regulations and when the Company believes that disclosure is necessary to protect our rights and/or to comply with a judicial proceeding, court order, or legal process served. The Company will not be liable for misuse or loss of personal information resulting from cookies on the Company's site(s) that the Company does not have access to or control over. The Company will not be liable for unlawful or unauthorized use of your personal information due to misuse or misplacement of your passwords, negligent or malicious. Further information on Company's Privacy is available upon request from Company's offices

at: Tel. +357 25 024 000, or e-mail: dpo@fxopen.eu

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Website: www.fxopen.eu