

# Privacy Policy

## 1. Introduction

- 1.1 AT Global Markets LLC (the "Company") and everyone responsible for using data follow strict rules on how personal information can be collected and used. Users must make sure the information is:
  - 1.1.1 used fairly and lawfully;
  - 1.1.2 used for limited, specifically stated purposes;
  - 1.1.3 used in a way that is adequate, relevant and not excessive;
  - 1.1.4 accurate;
  - 1.1.5 kept for no longer than is absolutely necessary;
  - 1.1.6 handled according to people's data protection rights;
  - 1.1.7 kept safe and secure;
  - 1.1.8 not transferred without adequate protection.
- 1.2 ATFX is the data controller in respect of the information it gathered from its clients including that obtained via ATFX's website ("Website"). In accordance with the legislation ATFX views the protection, privacy and the safeguarding of that personal and financial information of clients and Website visitors as a high priority.
- 1.3 This statement outlines ATFX's privacy policy and explains how ATFX ensures all personal information collected by it remains confidential and how it respects each individual's privacy and safeguards it at all times. By opening an account or by using the Website, clients give their consent to the collection and use of personal information by ATFX as explained in this privacy statement.

## 2. Collection of and Use of Personal Information

- 2.1 ATFX obtain details from each client in order to verify identity and assess appropriateness for opening a trading account. Information collected includes personal names, physical and email addresses, telephone numbers, dates of birth, occupation, passport and other identification details, and personal financial information including annual income and approximate net worth to assess a client's financial positions. In addition, ATFX may collect other information in order to better assess client's particular interests etc. for customising websites and general marketing purposes.

## 3. Our Affiliates and Partners

- 3.1 ATFX may at times enter into partnerships and alliances which may include joint marketing and affiliate agreements with other companies who offer products and services that might be of value to ATFX's clients. ATFX may share information with such partners and affiliates if the information is required to provide the product or service a client has requested; or to provide a client the opportunity to participate in the products or services the partner or affiliates offer; and in order to ensure that such products and services meet a client's needs and are delivered in a manner that is

useful and relevant. The use of a client's personal information is limited to the purposes identified in ATFX's relationship with the partner or affiliate.

#### 4. Using Your Information to Help in the Prevention of and Including Terrorism and Crime

- 4.1 Where we are required by law, your personal information may also be disclosed to an applicable governmental, regulatory or enforcement authority. These authorities may then use your personal information to investigate and act on any breach of law or regulatory rules in accordance with their procedures.

#### 5. Third Parties and Transfers of Personal Data

- 5.1 ATFX does not sell, license, lease or otherwise disclose any client's personal information to any third party for any reason, except in the following circumstances:
- 5.1.1 where required by regulatory, law enforcement or other government authorities;
  - 5.1.2 when necessary to protect ATFX's rights or property;
  - 5.1.3 to help improve services to clients where ATFX may engage another business to help carry out some internal functions such as account processing, order fulfilment, customer service, client satisfaction surveys or other support services or data collection activities relevant to ATFX's business.
- 5.2 Information may be processed by staff who work for ATFX or for one of ATFX's suppliers. ATFX may also provide a party with client information from a Company database to help analyse and identify client needs and notify clients of product and service offerings. Use of the information shared is strictly limited to the performance of the task ATFX requests and for no other purpose.
- 5.3 All third parties with whom ATFX shares personal information are required to protect personal information in a manner similar to ATFX protects personal information.

#### 6. Security

- 6.1 All information that clients provide to ATFX is stored on secure servers. Payment transactions are encrypted using SSL technology. Where ATFX has given, or where a client has chosen, a password to access certain parts of the Website including the trading and client account area, the client is responsible for keeping the password confidential and clients should not share the password with anyone.
- 6.2 The transmission of information via the Internet can never be completely secure. Although ATFX does its best to protect personal data it cannot guarantee the security of data transmitted to the Website and any transmission is at a client's own risk. Once it has received client information ATFX will use strict procedures and security features to try to prevent unauthorised access.

## 7. Restriction of Responsibility

- 7.1 If at any time any client chooses to purchase a product or service offered by another company, any personal information the client shares with that company will no longer be controlled under this Company's privacy policy. ATFX is not responsible for the privacy policies or the content of sites that its Website links to and has no control over the use or protection of information provided by clients or collected by those sites. Whenever a client elects to link to a co-branded or linked website, the client may be asked to provide registration or other information and such information will be going to a third party and the client should therefore first become familiar with the privacy policy of that third party.

## 8. Marketing

- 8.1 ATFX may use client data in order to provide information about products and services which could be of interest and Company staff or agents may contact a client about them by email, telephone and post. In order to prevent information being used in this manner, clients should tick the relevant boxes when being asked for their marketing preferences. These set preferences can be changed at any time by contacting ATFX. An opt-out election made by one account owner of a joint account is applicable to all account owners of the joint account. An opt-out election must be made for each separate account a client holds with ATFX.

## 9. Training of Staff

- 9.1 ATFX provide regular training to our staff on their privacy obligations. We regard data protection breaches very seriously and will enforce appropriate action whether the breach is deliberate or through negligence.

## 10. Recording Telephone Calls

- 10.1 ATFX may monitor or record phone calls with you in case we need to check we have carried out your instructions correctly, to resolve any queries or issues, for regulatory purposes and to help improve our quality of service and to help detect or prevent fraud or other crimes. Conversations may also be monitored for staff training purposes.

## 11. Use of Cookies

- 11.1 ATFX uses cookies to assist it in securing client trading activities and to enhance the performance of the Website. Cookies are small text files sent from the web server to a client's browsing device. Cookies used by ATFX do not contain any personal information nor do they contain account or password information. Cookies are used for various purposes such as allowing the Website to recognise that a page request comes from someone who has already logged on, and to recognise

individual user preferences in order to deliver a bespoke presentation of the site to a client. For further information on the use of cookies clients should read ATFX's separate Cookies Policy.

- 11.2 ATFX may share Website usage information about visitors to the Website with reputable advertising companies for targeting ATFX's Internet banner advertisements on the Website and other sites. For this purpose, pixel tags may be used to note the pages a client has visited. The information collected by the advertising company through the use of these pixel tags is not personally identifiable.

## 12. Clients Rights

- 12.1 A client has the right to request a copy of all the information ATFX holds on them. A fee might be charged for providing this. A client also has the right to have any inaccuracies corrected, the right to object to the use of their data, and the right to block any specific uses of their data by ATFX by means of a request in writing to the customer service team at [info.gm@atfx.com](mailto:info.gm@atfx.com).

## 13. Changes to this Privacy Statement

- 13.1 ATFX may from time to time revise and update this Privacy Statement and will promptly post the new version on the Website as well as posting a notice on it to inform all clients of the change. The client agrees to accept a posting of a revised Privacy Statement electronically on the Website as actual notice to them. Any dispute over ATFX's Privacy Statement is subject to this notice and ATFX's Terms and Conditions. ATFX encourages clients to periodically review this privacy statement so that they are aware of the information ATFX collects, how it is uses it and to whom else it might be disclosed. If a client has any questions that this Privacy Statement does not address, they should contact a Customer Services representative of ATFX.