



## PRIVACY COOKIE POLICY

### Introduction

Maxiflex Ltd, previously Maxiflex Global Investments Corp Ltd, (hereinafter, “the Company”) is an Investment Firm regulated by the Cyprus Securities and Exchange Commission (hereinafter, “CySEC”) with licence number 258/14.

The Investment Services and Activities and Regulated Markets Law of 2017 (L. 87(I)/2017), including all its amendments and the Directives issued by CySEC (the “Regulations”) are the regulatory framework that governs Trading in Financial Instruments.

This policy outlines the Company’s responsibility to manage the protection of privacy and the safekeeping of clients’ personal and financial information. Your privacy is Company’s highest priority and applies to all users of the Company’s website (“website”), whether you are a former, present or potential client of the Company.

The Company follows difference principles in accordance to global protection acts in order to achieve client privacy and data protection. By subscribing to and/or using (collectively, “Using” or “Use”) the Service, the Client express his consent to the terms of this Policy. If the Client does not agree to the terms and provisions of this Policy the Client shall not Use the Service. The Client hereby gives its consent to such collection, processing, storage and use of personal information by the Company as explained below.

In addition, as a recipient of our Service, the Client commits to provide appropriate notice of its privacy practices to, and obtain the necessary permissions and consent from any User whose Personal Information is collected, received, used, and/or disclosed (collectively, “Process(ed)”) by the Company.

### Personal data

The Client’s privacy is important to the Company, therefor the Company shall treat all information collected by, or transmitted to, the Company with care, in particular, personally identifiable information, and this Policy describes how, when, and why the Company shall collect such information. “Personally identifiable information” (or “Personal Information”) means any information that may be used, either alone or in combination with other information, to personally identify, contact or locate any employee, representative and third party associated with the Client (collectively referred as “User”). Personal Information includes, but is not limited to, a first and last name, ID numbers, financial data (including trading data, deposits, withdrawals, and credit), email and physical addresses, and other contact information. Any information that does not enable identification, location, or contacting of the User, such as aggregated information, is “Anonymous Information”, and



the Company may Process (defined below) Anonymous Information in any way it so chooses without prior notice the Client.

With your Consent, the Company will collect the necessary personal information required in order for the Company to perform its services offered to clients efficiently. In order for the Company to construct a clients' profile to assist in providing its services effectively based on the requirements and preferences of the client, the Company may in certain circumstances gather information from third parties, such as banks, credit agencies and/or other sources.

The Information collected by the Company during any registration process on the website, shall include required information needed to communicate and verify the identity of its clients, such as, but not limited to, clients' passport, utility bills and bank statements or company incorporation documents, collection of demographic information, including but not limited to occupation, birth date, location etc., financial details in relation to clients' net worth and estimated annual income, and to assess the trading knowledge and experience of its client.

In accordance to the Company's regulatory requirements, all clients' personal information will be required to be kept on record for a minimum period of five (5) years, which will commence on the transmission/execution of a client transaction or the date of which the business relationship between both parties is terminated in accordance to the Company's Terms and Conditions ("Agreement").

### **Usage of personal information**

In order for the Company to provide, monitor and improve the quality service and security to its clients, the Company may use the clients' personal information for one or more of the following processes:

a) Verify the identity of the client, b) Assess and improve the products and services provided to clients, c) Transmission/execution of client orders, d) Company's transmission/execution and post transaction/order services, e) Assess and improve clients' browsing experience, f) Inform clients of additional products, services or promotions relevant to its clients.

In regards to point (f) above, for any reason should the client not consent to receive information of this nature, the client can inform us accordingly by contacting the Company on the contact details provided by the Company on its Terms and Conditions or at the following address: [support@europefx.com](mailto:support@europefx.com)

In the event that the Company is acquired by, or merged with a third party, or undergoes a change of control, the Company reserve the right to transfer or assign the Personal Information it had collected or received to the transferee or assignee, and such information will become subject to the privacy policy of the transferee or assignee. Should such a sale or transfer occur, the Company will use reasonable efforts to direct the transferee or assignee to use the Personal Information in a manner that is consistent with this Policy.



In the event of our bankruptcy, insolvency, reorganization, receivership or other similar occurrence, the Company may not be able to control how the Personal Information held by us is treated, transferred, or used.

### **Protection and Security of personal information**

The Company does not sell, license or lease to anyone clients personal information provided to the Company, except as described in this Privacy Policy.

The Company takes reasonable precautions to protect Personal Information from loss, theft, misuse, unauthorized access or disclosure, alteration, or destruction. The Company employ physical, electronic, and procedural safeguards to protect Personal Information and it does not store Personal Information for longer than necessary to provide the Service or as permitted by law.

The Company's data center(s) contain both internal and external servers. Access to the Company's internal server is restricted to pre-approved persons, servers and locations; our external servers can be accessed via the Internet. Any personal information provided by the client to the Company will be strictly protected under enhanced measures of security, protected against loss, misuse, unauthorized access or disclosure, alteration, or destruction, use various security measures to protect your information from unauthorised users and will treated as confidential and shared only with the Company and its affiliates and not disclosed to any third parties except, and without notice, in accordance to do so under regulatory or legal proceedings, such as:

- a) In case such disclosure is required to be made by law or any regulatory authority, it will be made on a 'need-to-know' basis, unless otherwise instructed by the regulatory authority;
- b) Protect and defend the rights or property of the Company's website;  
Potential fraud;
- c) Protect the safety of all clients of the Company, all users of the website, and/or the public.

Under such circumstances, the Company shall expressly inform the third party regarding the confidential nature of the information. The Company also informs all clients to serve and protect their personal data, and advises all clients to maintain confidentiality and not share with others its usernames and passwords provided by the Company.

### **Affiliates and Partners**

The Company uses a card processing Company/-ies for your deposits and withdrawals to and from your trading account; The Company does not retain, share, store or use any personally identifiable information for any other purposes.



The Company and its partners, affiliates and/or associates may share information in a manner that is useful and relevant only where clients have authorised the Company to do so and in relation to one of the following purposes:

- Reasonably required by such affiliate, partner and/or associate of the Company to provide products and services to its clients,
- To offer additional similar products and services that meet clients' needs

#### **Non-affiliated third parties**

The Company may disclose information to non-affiliated third parties where necessary in order to carry out the following internal functions of the Company:

- Use of Credit reporting or collection agencies as reasonably required in order to provide the services to its clients,
- Use of specialized agencies to help carry out certain internal functions such as account processing, fulfilment, client service, client satisfaction surveys or other data collection activities relevant to its business

For any purpose mentioned above, the use of the shared information is strictly limited to the performance of the said internal function of the Company. All third parties, affiliated or non-affiliated, with which the Company shares personal information are required in similar manner of that of the Company and in accordance with all relevant legislation to protect such personal information. The Company will not share personal information with third parties which it considers will not provide its clients with the required level of protection similar to that of its own.

Clients may be introduced to the Company by a Business Introducer, in such cases the Business Introducer may have access to clients' information and clients hereby consent to the sharing of information with such Business Introducer.

#### **Contact Clients**

The Company may contact clients by telephone, email or other means of medium for the purpose of offering them further information about the Company's product and services and/or informing clients of unique promotional offerings. By registering and providing agreement to the terms and conditions of the Company client agreement, the clients consent to the receipt of such contact. For regulatory and quality assurance purposes all telephone conversation to and from clients are recorded by the Company.

Any person who wishes not to be contacted further by telephone, email or other means of medium, can inform us accordingly by contacting the Company on the contact details provided by the Company on its Terms and Conditions or at the following address: [dpo@maxiflexglobal.com](mailto:dpo@maxiflexglobal.com)



### **Restriction of responsibility**

The Company's website [www.europefx.com](http://www.europefx.com) may be linked to other sites, the Company will not be held responsible or liable for the privacy policies or content of such sites, and therefore has no control over the protection and use of information provided by the clients on such sites.

### **Use of "COOKIES"**

The company may use cookies to assess and improve the performance of the website and its products and services offered to its client. Cookies are used by most internet browsers and are small pieces of information which use a unique identification tag and are stored on your device as a result of you using this website or other services we provide to you.

Clients may be able to refuse to have cookies stored on their device by viewing options to change the setting of your browser to refuse all cookies, and/or notify you each time a cookie is sent from their device. By controlling your cookies in this way may impair the quality of service provided by the Company.

### **Updates**

The Company has the right to amend the current Policy at its discretion and at any time it considers is suitable and appropriate; the Company shall review and amend the current policy at least on an annual basis. The Policy is available for review by clients upon request and it is uploaded on the Company's website.

If there is anything in this Policy you do not understand or have any further queries, contact us at [support@europefx.com](mailto:support@europefx.com).