



## Privacy and Cookie Policy

### Information on the collection of Personal data

In this Privacy and Cookie Policy, Maxiflex Ltd as operator of this website informs you about the collection of personal data when using our website and/or using our services. Personal data is all data that can be related to you personally, such as your name, your address, your e-mail addresses or your user behavior.

**Last update: 11.1.2021**

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### 1. Controller

MAXIFLEX LTD (previously Maxiflex Global Investments Corp Ltd) is the controller in the sense of Art. 4 sec. 7 General Data Protection Regulation (GDPR), licensed by the Cyprus Securities and Exchange Commission under license number 258/14, incorporated and registered under the laws of the Republic of Cyprus, registration No. 327484 (hereinafter also referred to as: “**Maxiflex**”, “**we**” or “**our**”). Maxiflex has its registered office at 46 Ayiou Athanasiou, INTERLINK HERMES PLAZA, 1st Floor, Office 102 4102, Ayios Athanasios, Limassol, Cyprus.

You can contact our data protection officer by e-mail at [dpo@europafx.com](mailto:dpo@europafx.com) or by regular mail at our

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postal address, attention "Data protection officer".

## 2. Collected Personal data

We process various types of personal data from you - processing means in particular collecting, using, storing and transmitting:

- **Identity information** includes first name, maiden name, last name, proof of identity, username or similar identifier, marital status, title, date and place of birth and gender, country of residence and citizenship.
- **Contact Information** includes billing address, delivery address, email address and telephone numbers.
- **Professional Information** includes level of education, profession employer name, work experience in Forex/CFD's, information on client's experience, knowledge in the forex industry and risks.
- **Tax data** includes country of tax residence and tax identification number.
- **Financial Information** includes annual income, net worth, source of funds, anticipated account turnover, bank account, bank statements, payment card details and copies, e-wallet information.
- **Transaction Information** includes details about payments to and from you and other details of products and services you have purchased from us, deposit methods, purpose of transactions with us.
- **Profile data** includes your username and password, purchase or order made by you, your interests, preferences, feedback, and survey responses.
- **Usage Information** includes information about how you use our website, products, and services.
- **Marketing and Communication Information** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Technical data** are data from or about your device (for example your computer or your mobile device when you access our services and visit our site. This includes, but is not limited to: your login credentials, UDID, Google Advertising ID, IDFA, cookie identifiers, and may include other identifiers such as your operating system version, browser type, language preferences, time zone, referring domains and the duration of your visits.

If we combine personal data with non-personal data about you, the combined data will be treated as personal data for as long as it remains combined.

Which personal data we process from you depends on whether you are merely a user of our website or use other services from us. As mere website user, we collect only technical data and, where applicable, marketing and communication information from you (see sections 4. and 5. of this Privacy Policy). If you register with us to use other services, we will also process additional personal data about you.

## 3. Purposes for which we use your Personal data

The processing of your personal data may be necessary pursuant to Art. 6 sec. 1 lit. b GDPR for the performance of a contract to which you are a party or in order to take steps at your request prior to entering into a contract with you, such as the collection of the information necessary to open a trading account for you.

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The processing of your personal data may also be necessary pursuant to Art. 6 sec. 1 lit. c GDPR for compliance with a legal obligations to which we are subject as a controller, in particular to comply with supervisory and banking law requirements.

Furthermore, processing may be necessary pursuant to Art. 6 sec. 1 lit. f GDPR in individual cases for the purposes of our legitimate interests as controller, for example in order to collect payments to which we are entitled.

Below we have listed a description of all the ways in which we process your personal data and the legal basis on which we base each processing (note that we may process your personal data for more than one lawful ground depending on the specific purpose for which we are using your personal data):

Purpose/Activity	Type of Data	Lawful basis for processing including basis of legitimate interest
To register you as a new customer	a) Identity b) Contact c) Financial d) Professional e) Tax	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Compliance with legal obligations</li> </ul>
To process and deliver your order including: <ul style="list-style-type: none"> <li>• Manage payments, fees and charges</li> <li>• Collect and recover money owed to us</li> </ul>	a) Identity b) Contact c) Financial d) Transaction e) Marketing and Communications	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Necessary for the purposes of our legitimate interests (To recover debts due to us, for your Scoring as well as to optimize the service for you)</li> </ul>
To manage our relationship with you which will include: <ul style="list-style-type: none"> <li>• Notifying you about changes to our terms or privacy policy</li> <li>• Asking you to leave a review or take a survey</li> </ul>	a) Identity b) Contact c) Profile d) Marketing and Communications f) Usage	<ul style="list-style-type: none"> <li>• Performance of a contract with you</li> <li>• Compliance with legal obligations</li> <li>• Necessary for the purposes of our legitimate interests (to keep our records updated and to study how customers use our products/services)</li> </ul>
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	a) Identity b) Technical c) Usage a) Contact	<ul style="list-style-type: none"> <li>• Necessary for the purposes of our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise)</li> <li>• Compliance with legal obligations</li> </ul>
To deliver relevant website content and	a) Identity	<ul style="list-style-type: none"> <li>• Necessary for the purposes of our legitimate interests (to study how</li> </ul>

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advertisements to you and measure or understand the effectiveness of the advertising we serve to you	<ul style="list-style-type: none"> <li>b) Contact</li> <li>c) Profile</li> <li>d) Marketing and Communications</li> <li>e) Technical</li> <li>f) Usage</li> </ul>	customers use our products/services, to develop them, to grow our business and to inform our marketing strategy)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	<ul style="list-style-type: none"> <li>a) Technical</li> <li>b) Usage</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for the purposes of our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)</li> </ul>
To perform automated decision in order to identify your knowledge and experience in Forex industry and to identify your risk profile (Appropriateness and Suitability Test)	<ul style="list-style-type: none"> <li>a) Identity</li> <li>b) Financial</li> <li>c) Professional</li> </ul>	<ul style="list-style-type: none"> <li>• Compliance with legal obligations</li> </ul>
To make suggestions and recommendations to you about goods or services that may be of interest to you	<ul style="list-style-type: none"> <li>a) Identity</li> <li>b) Contact</li> <li>c) Technical</li> <li>d) Usage</li> <li>e) Profile</li> </ul>	<ul style="list-style-type: none"> <li>• Necessary for the purposes of our legitimate interests (to develop our products/services and grow our business)</li> </ul>

#### 4. Cookies

In addition to the aforementioned *technical data*, we use cookies that are saved on your computer when you use our website. Cookies are small text files that are saved on your device assigned by the browser you are using and through which can gather certain information. Cookies cannot execute programs or transmit viruses to your computer. They help us to make the website more user-friendly and effective. This website uses the following types of cookies, the scope and function of which are explained below:

##### a) Transient Cookies

Transient cookies include in particular session cookies. They store a so-called session ID, which can be used to assign various requests from your browser to the shared session. This enables your computer to be recognized when you return to our website. Session cookies are deleted when you log out or close your browser.

##### b) Persistent Cookies

Persistent cookies are automatically deleted after a specific period, which may vary depending on the cookie. You can delete cookies at any time in the security settings of your browser.

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### **c) Browser Settings**

On your first visit to our website or when necessary, we will show you a "cookie banner" to let you know that and how we use cookies and other tracking technology to improve the user experience on our website and for web analytics and interest-based advertising purposes. The related data processing is described in detail in this section. As indicated in the cookie banner, you consent to this use by clicking "Accept". You can limit your consent to the use of cookies in whole or in part by configuring your browser settings accordingly or by deactivating the use of cookies in whole or in part, for example by refusing third-party cookies or all cookies. Please note that if you limit or (partially) disable cookies, you may not be able to use all the features of this website. You will, however, still be able to access this website and it will function properly.

We use cookies to identify you for subsequent visits, if you have an account with us, and to provide our users with an individual browsing experience. Otherwise, you will need to log in each time you visit our website. The Flash cookies used are not captured by your browser, but by your Flash plug-in. We also use HTML5 storage objects, which are stored on your end device. These objects store the required data regardless of the browser you are using and do not have an automatic expiration date. If you do not wish the Flash cookies to be processed, you must install an appropriate add-on, e.g. "Better Privacy" for Mozilla Firefox:

(<http://tools.google.com/dlpage/gaoptout?hl=en>) or the Adobe Flash Killer cookie for Google Chrome. You can prevent the use of HTML5 storage objects by using private mode in your browser. We also recommend that you regularly delete your cookies and browser history manually.

## **5. Tracking**

When you visit our website or access our services, we use cookies as well as pixels and other technologies ("Tracking Technologies") and might authorize third parties to use them. These Tracking Technologies enable us to automatically collect information about you, your device and your online behavior in order to improve our services and the performance of our website, perform analysis and customize your experience with it. In addition, we may consolidate information we have with other information collected through tracking technologies and with information we obtain from other sources, and as a result, this information may become personal data.

Our company uses Google Analytics, Google Tag Manager, Google AdWords (Conversion Tracking) and Facebook (Conversion Tracking). Technologies such as cookies, beacons, tags and scripts are used by our partners, affiliates, analysts or service providers. We may receive reports on the use of these technologies by such companies, either individually or in aggregate form.

### **a) Google Analytics**

Google Analytics, a web analytics service provided by Google LLC, 1600 Amphitheatre Parkway, Mountain View, CA 94043, USA ("Google"), uses cookies to help us to analyze how users use our website. The information generated by the cookie about your use of the website will generally be transmitted to and stored by Google on servers in the United States. However, your IP address will be shortened by Google within member states of the European Union or in other contracting states of the Agreement on the European Economic Area and thus made anonymous. Only in exceptional cases is the full IP address transmitted to a Google server in the USA and shortened there. On behalf of the operator of this website, Google will use this information to evaluate your use of the website, to compile reports on website



activity and to provide other services related to website activity and internet usage to the website operator. The IP address transmitted by your browser as part of Google Analytics is not combined with other data from Google. You can find further information on data protection of Google Analytics under: <https://www.google.com/intl/en/policies/>.

#### **b) Google Tag Manager**

Google Tag Manager is a tool that allows us to manage website tags through a single interface. The tool Tag Manager (which implements the tags) is a cookie-free domain and does not collect personal data but transfers them. The tool activates other tags that may themselves collect data. Google Tag Manager does not access this data. If deactivation has been made on the domain or cookie level, it will persist for all tracking tags implemented with Google Tag Manager.

#### **c) Google AdWords**

Google AdWords is used to draw attention to our offers with the help of advertising media (so-called Google Ads) on external websites. In relation to the data of the advertising campaigns, we can determine how successful the individual advertising measures are. In doing so, we pursue the interest of displaying advertising to you that might be of interest to you, of making our website more interesting for you and of achieving a fair calculation of advertising costs. These advertising media are delivered by Google via so-called "Ad Servers". We also use ad server cookies to measure how successful we are with displaying ads or in terms of clicks on our website. If you access our website via a Google advertisement, Google stores a cookie on your terminal device. These cookies usually lose their validity after 30 days and are not intended to identify you personally. You can find further information on the functioning under: <https://policies.google.com/technologies/ads?hl=en>.

#### **d) Facebook**

We use marketing tools from Facebook, Inc. – for users from the European Economic Area: Facebook Ireland Ltd. – ("Facebook Custom Audiences" or also "Facebook pixels") to carry out targeted advertising measures, target group formation and evaluation of Facebook ads for statistical purposes. These enable us to determine the right target groups for our products and the presentation of advertisements on Facebook due to our legitimate interests in the analysis and optimization of our offer. The Facebook Pixel allows us to display our ads only to those users who have shown an interest in our offers or whose interest matches the interest of our customers (custom audiences). The Facebook Pixel also enables us to analyze how effective our ads are on Facebook. In addition, we can better reach people so that our ads are not shown to people who might have no interest at all in these ads.

Through the Pixel your browser automatically establishes a connection to the Facebook server and transfers the respective usage data to Facebook. We have no influence on the extent and use of the data by Facebook. Facebook receives data about your user behavior, which may also be linked with other data about you on Facebook.

Facebook, Inc. is certified under the EU-US Privacy Shield (<https://www.facebook.com/about/privacysshield>). You can find further information about Facebook's handling of personal data at: <https://www.facebook.com/about/privacy/update>. Even after giving consent to the use, you may opt out (withdraw your consent) at any time. You can also change what types of ads Facebook displays to you in the appropriate Facebook settings page at: [https://www.facebook.com/ads/preferences/?entry\\_product=ad](https://www.facebook.com/ads/preferences/?entry_product=ad). For more information about how the

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Facebook pixel works, please visit the Facebook Help Center at: <https://www.facebook.com/business/help/651294705016616>.

#### e) Personal settings

You can prevent cookies from being saved by making the appropriate settings in your internet browser and rejecting them or using a privacy plug-in. You can also prevent Google from collecting the data generated by the cookie and related to your use of the website (including your IP address) and Google from processing this data by downloading and installing a browser plug-in available under the following link (<http://tools.google.com/dlpage/gaoptout?hl=de>):.

#### 6. Unsubscribe from our newsletter

If you have subscribed to our newsletter and you do not want us to use or share your personal data for marketing purposes anymore, you can unsubscribe from the mailing list in the "Unsubscribe" section. Upon receipt of your unsubscribe wish, we will stop using your personal data for marketing purposes. However, please note that in such case, we may continue to use your personal data for non-marketing purposes and pass them on to third parties (e.g. to fulfil your enquiries, communicate with you and respond to your enquiries, etc.). In such cases, the companies to which we share your personal data may be entitled to use your personal data only as needed to provide these non-marketing services.

#### 7. With whom we share Your Personal data

The personal data obtained about you will be treated confidential. We will share your personal data only in the following cases:

- **Internal use**- We share your information with affiliated companies, as well as our employees limited to those employees or partners who need to know the information in order to provide you with our services.
- **Financial providers and payment processors** - We share your financial information about you for purposes of accepting deposits or performing risk analysis.
- **Business partners** - We share your information with service providers, such as storage providers and analytics providers who help us provide you with our service. If you are a customer from Germany, we also share your personal data with SF Market Services Europe GmbH, Franklinstraße 28-29, 10587 Berlin, Germany. SF Market Services Europe GmbH are processing personal data on our behalf and are legally bound to us by a contract in the meaning of Art. 28 GDPR.
- **Legal and regulatory entities** - We may disclose any information in case we believe, in good faith, that such disclosure is necessary in order to enforce our Terms or Client Agreement, take precautions against liabilities, investigate and defend ourselves against any third-party claims or allegations, protect the security or integrity of the site and our servers and protect the rights and property of the Company, its users and/or partners. We may also disclose your personal data where requested by our supervisor or any other regulatory authority having control or jurisdiction over us, you or our associates or in the territories we have clients or providers, as a broker.
- **Mergers and acquisitions** – We may share your information if we enter into a business transaction such as a merger, acquisition, reorganization, bankruptcy, or sale of some or all of our assets. Any party that acquires our assets as part of such a transaction may continue to use your information in accordance with the terms of this Privacy Policy.
- **International Transfers of Personal data**- Some of our external third parties are based outside

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the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA. Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the EU-US Privacy Shield. This Privacy Shield, for example, requires the implementation of data protection precautions that guarantee data protection comparable to GDPR.

### **8. Automated individual decision-making, including profiling**

In order to perform the contract between us and as authorized by the relevant regulations [Directive 2014/65/EU MIFID, Law 87(i)/2017 and Circular 168 and 028 of Cyprus Securities and Exchange Commission] it is requested for the provision of the investment services to you and once per calendar year thereafter, to assess your knowledge and experience, your financial situation and investment objectives and your risk profile. We fulfil the above requirements through the following tools:

#### **a) Appropriateness Test**

The Appropriateness Test takes place, when you register as a client of us. Hence, we need to check and ensure that you are suitable for the provision of our services and products by taking an appropriateness test in regard to your knowledge, financial background and experience in regard to financial services. Based on the scoring you receive, you will be informed whether you are eligible to receive our services and become our client and the maximum level of leverage you are eligible to. The reason for assessing your appropriateness is to provide you with the services that are appropriate for you and thus act in our customer's best interest.

#### **b) Suitability Test**

The Suitability Test takes place, when you request to be offered our investment program. In this respect you will be required to take a suitability test in order to assess your financial situation, risk profile and risk tolerance as an investor and that the investment program is suitable for you. Based on your scoring, we will be able to assess your investment objectives, if you are able financially to bear any related investment risks consistent with your investment objectives. The reason for assessing your suitability is to enable us to act in the client's best interest. The scorings above are monitored by our Compliance department.

#### **c) Suitable measures pursuant to Art. 22 GDPR**

You can view your results and an explanation of the evaluation and have the right to obtain human intervention on the part of the Controller. You also have the right to express your own point of view and to contest the decision. You can do this by sending an e-mail to [compliance@maxiflex.com](mailto:compliance@maxiflex.com). During these processes, we take all technical and operational measures to correct inaccuracies and minimize the risk of error, to avoid discrimination and to protect personal data of the customer.

### **9. Recording of telephone conversations and of electronic communication**

As per applicable legislation, we are obliged to prepare records of the securities services we provide and the transactions we conduct. As such, we are legally obliged to record and monitor telephone

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conversations and/or electronic communications between us and you, such as through fax, email, social media, electronic messages, whether initiated from our or your side. All such communications are recorded and/or monitored and/or processed by us, including any telephone conversations and/or electronic communications that result or may result in transactions or client order services even if those conversations or communications do not result in the conclusion of such transactions. If you disagree with such recording, monitoring and processing, we cannot offer any telephone or electronic communication to you. The content of relevant in person conversations and/or communications with you may be recorded by minutes or notes. Any such records shall be provided to you upon request in the same language as used to provide investment services to you.

#### **10. Protection of your personal data**

The protection of your privacy and your personal data is very important to us. We have taken appropriate technical, physical and organizational measures to prevent unauthorized access, use or disclosure of your personal data. Your data is stored on secure servers and it is not publicly accessible. We limit access to your data only to those employees or partners who need to know the information to carry out the agreement between us or to achieve the respective purpose of the processing.

When you enter sensitive information (such as personal name, phone and/or email) on our registration or order forms, we encrypt that information using secure socket layer technology (SSL). No method of transmission over the Internet or method of electronic storage, is 100% secure, however. Therefore, we cannot guarantee its absolute security. We take reasonable precautions to ensure that your personal data is protected against loss, theft, misuse, unauthorized access or disclosure, alteration or destruction. However, we would like to point out that we cannot ensure or warrant the security of any information you transmit to us or guarantee that your information on our Service may not be accessed, disclosed, altered or destroyed by breach of any of our industry standard physical, technical or managerial safeguards of the information you transmit to us. This also applies if we use an external help desk, trading services or a credit card processing company to bill you.

In the event that personal data is compromised by breach of security, we will inform our customers immediately in accordance with applicable law.

#### **11. Duration of storage**

We will only store your personal data for as long as it is necessary to provide you with our services, to comply with our legal obligations, to resolve disputes, or to enforce our policies.

To determine the appropriate retention period for personal data, we take into account the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorized use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes by other means, and the applicable legal requirements.

If you deposit funds with us, we are legally obliged to store your personal data for a minimum of five years.

#### **12. Your Rights as data subject**

Data protection law grants you a number of rights with regard to your personal data (so-called data subject rights). In general, these are:

- **Right of access** to your personal data. You have a right to receive a copy of your personal data that

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we have stored and check whether we are processing it lawfully.

- **Right to rectification** of your personal data that we store. You can have incomplete or inaccurate information that we store about you corrected.
- **Right to request erasure** of your personal data. You have the right to ask us to delete or remove personal data if there is no legitimate reason for further processing. You also have the right to ask us to delete or remove your personal data if you have successfully exercised your right to object to processing (see below), if we may have unlawfully processed your data or if we are required by applicable local law to delete your personal data. Please note, however, that for certain legal reasons, which may be disclosed to you at the time of your request, we may not always be able to comply with your request for deletion. This may be because of statutory storage obligations.
- **Right to object to the processing** of your personal data if we rely on a legitimate interest (or that of a third party) but your interests, fundamental rights or freedoms require the protection of your personal data and outweigh our interests. You also have the right to object if we process your personal data for direct marketing purposes.
- **Right to restriction of processing** your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios: (a) if you want us to prove the accuracy of the data; (b) if our processing of the data is unlawful, but you do not want us to delete it; (c) if you want us to retain the data, even if we no longer need it, as you need it to establish, exercise or defend against legal claims; or (d) if you have objected to our processing of your data, but we need to verify whether we are actually entitled to do so.
- **Right to data portability** of your personal data to you or a third party. We will provide you or a third party of your choice with your personal data in a structured, commonly used, machine-readable format. Please note that this right only applies to automated information that you originally provided to us or where we used the information to fulfill a contract with you.
- **Right to object to certain processing and to withdraw your consent.** However, this does not affect the lawfulness of a processing that was carried out before the objection or withdrawal of your consent or is justified by another legal basis. If you revoke your consent, we may not be able to offer you certain products or services. We will inform you if this is the case at the time you withdraw your consent.
- **Right to complain to a supervisory authority** if you are of the opinion that the processing of your personal data violates the General Data Protection Regulation. As a rule, you can contact the supervisory authority of your usual place of residence or workplace or of our registered office.

**If you wish to exercise any of the GDPR rights set out above, please complete and submit the request using the online form that can be found on your client's area. You can also contact us or our data protection officer by post or e-mail (contact data under no. 1).**

\*If you have any difficulties finding the online request form, please contact our Customer Service (support@europafx.com) for further explanations and instructions.

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### **13. Time limit to respond**

We try to respond to all legitimate requests within one month. However, in some cases, this may take longer than one month, for example if your request is particularly complex or you have made a number of requests. In this case we will inform you and keep you updated.

### **14. Account Closure**

If you terminate or close your account, please note that for legal and regulatory reasons (as described above), personal data may continue to be stored but may no longer be accessible through your account.

### **15. Updates to this Policy**

New legal requirements, business decisions or technical developments may require changes to our privacy policy. The data protection policy will then be adapted accordingly. You will always find the latest version on our website. It is recommended to inform yourself regularly about updates. In the event of significant changes, we will inform you on our website. By continuing to access or use our services after changes take effect, you agree to the updated policy.

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