

# PRIVACY POLICY



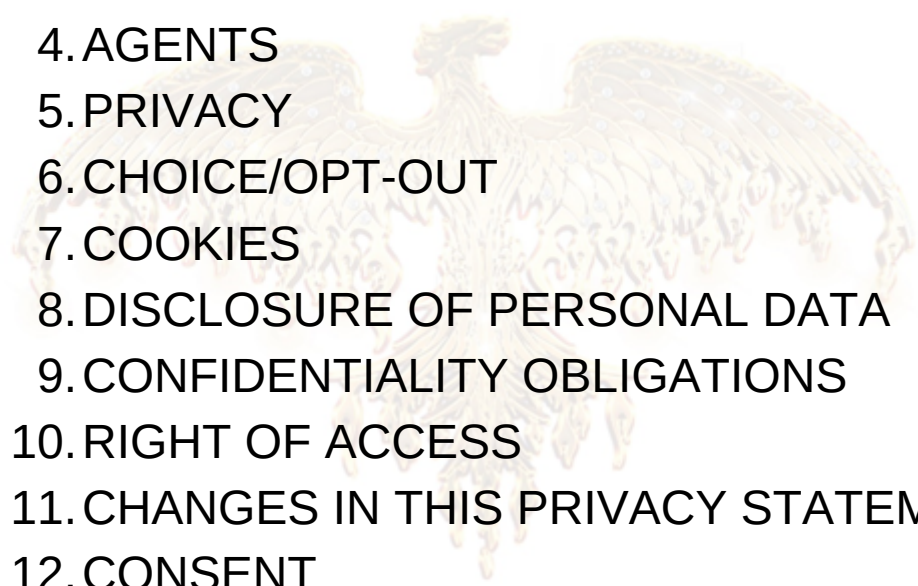

## PHOENIX 4X

The Trader's Choice





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The 'Privacy Policy' is entered by and between Phoenix4x 4X LLC and the Client.

Phoenix4x 4X LLC Limited is registered within St. Vincent and the Grenadines, Suite 305, Griffith Corporate Centre, Beachmont Kingstown, SVG. Of the present agreement, Phoenix4x 4X LLC shall be referred to as 'Phoenix 4X'.

## 1. INTRODUCTION

This Policy applies to existing and potential clients as well as to any visitors of the Company's website(s).

The Company is committed to protecting the privacy of all personal data which it obtains from you, including information obtained during your visits on this website.

## 2. COLLECTION OF PERSONAL DATA

The Company will only use your personal data in accordance with worldwide data protection practices. The Company will use, store, process and handle personal information of the Client. In order to open an account with the Company, you must first complete and send the application form attaching the required documents. By completing the application form you are requested to give private information in order to enable the Company to evaluate your application and comply with Laws and Regulations governing the provision of financial services. This information is also used to contact you about the Company's services. Personal data collected includes but is not limited to:

1. Personal details such as name, address, telephone number and/or e-mail address;
2. Financial details such as estimated annual income and net worth, trading experience and investment knowledge;
3. Identity verification Documents such as passport and ID, utility bills, and/or bank statements or your company information certificate/details.
4. Details of visitors visits to the company's website and clients' sessions through the Company's platforms collected through cookies such IP and domain name.
5. Data about marketing preferences in order to deliver tailored content.
6. If your personally identifiable information changes, you must inform us by emailing our Customer Support at [support@phoenix4x.com](mailto:support@phoenix4x.com)
7. We do not knowingly or specifically request to collect personal information from any person under the age of eighteen as Company's services and products are not offered to persons under eighteen years of age. In case of unintentionally collection of such data the Company shall delete such information as soon as we get notified or be aware of it.
8. It's the responsibility of the Client to properly hide specific personal details according to Phoenix 4X compliance procedures in regards to providing Card documentation requests.

## 3. USE OF PERSONAL DATA

The following list illustrates the reasons why the Company may need to use your personally identifiable information:

To verify your identity

- To ensure that you meet the suitability requirements to use our products and services
- To manage the account you have with us
- To process your transaction
- To send you information about transactions/post-transactions services
- To keep you updated with news on our products, services and any other information relevant to your working relationship with the Company
- For website improvement purposes
- For the analysis of statistical data which will help us provide you with better products and services in the future
- For complying with regulatory obligations and legal practices, policies and procedures and identify unlawful activities
- For enhancing the security of the Company's websites, platforms and information systems
- For enhancing the trading environment and the services and products offered.
- For record purposes

The client has the right to withdraw the consent of using personal data at any given time by notifying the Company.

### 3.1. STATISTICAL DATA

The Company may, from time to time, combine your personally identifiable Information with information from other users of this website to create impersonalized statistical data. The Company may provide this statistical data to Third Parties solely for statistical purposes and in an effort to better improve the Company's marketing campaign and to the extent allowed by the Terms and Conditions already accepted by you.

In no circumstances will you be able to be identified from this statistical data; you will remain anonymous.

### 3.2. RECORDS

Under Applicable Regulations, the Company will keep records containing Client personal data, trading information, account opening documents, communications and anything else which relates to the Client for five (5) years, which is calculated after the execution of the transaction or the termination of the business relationship or in case of termination of our business relationship.

### 3.3. RECORDINGS

Telephone conversations between the Client and the Company may be recorded and recordings will be the sole property of the Company. The Client accepts such recordings as conclusive evidence of the Orders/Instructions/Requests or conversations so recorded.

## 4. AGENTS

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

## 5. PRIVACY

Any personal information you provide to the Company will be treated as confidential and shared only within the Company, its affiliates and its business partners and will not be disclosed to any third party except under any regulatory or legal proceedings as well as to third parties that solely provide statistical services to the Company to improve its marketing campaign. Web site tracking systems may also collect data detailing the pages you have accessed, how you discovered this site, the frequency of visits and so on. The information the Company obtains is used to improve the content of our web site and may be used by us to contact you, by any appropriate means, and to provide you with any information we believe may be useful to you. The personal information that you provide in connection with registering yourself as a user of the website(s) or of the Services is classified as Registration Information.

Registration Information is protected in many ways. You can access your Registration Information through a password selected by you. This password is encrypted and known only to you. Your password must not be revealed to anyone. Registration Information is safely stored on secure servers that only authorized personnel have access to via password. The Company encrypts all personal information as it is transferred to the Company and thus makes all necessary effort to prevent unauthorized parties from viewing any such information. Personal information provided to the Company that is not Registration Information also resides on secure servers and is again accessible only to authorized personnel via password. This information cannot be online accessible by you, therefore no password shall be selected to view or modify this information.

## 6. CHOICE/OPT-OUT

If you no longer wish to receive any promotional communications, you may opt-out of receiving them by following the instructions included in each communication.

You will be notified when your personal information is collected by any third party that is not our agent/service provider, so you can make an informed choice as to whether or not to share your information with that party.

## 7. COOKIES

A cookie is a small text file that is stored on a user's computer for record-keeping purposes. The Company uses cookies on this website. The Company does link the information that it stores in cookies to any personally identifiable information you submit while on our website(s). The Company uses cookies to optimize the function of our website and personalize content and ads in accordance with your preferences, to provide social media features and to analyze our traffic. We also share information about site visitors with our social media, advertising and analytics partners. The company and its partners do not use cookies to collect personal identifiable information about you. The cookies that we use collect solely anonymous information and traffic data that is used to enhance our services.

The Company uses both session ID cookies and persistent cookies. A session ID cookie does not expire when you close your browser. A persistent cookie remains on your hard drive for an extended period of time. You can remove persistent cookies by following directions provided in your Internet browser's "help" file.

The Company sets a persistent cookie for statistical purposes. Persistent cookies also enable the Company to track and target the location and the interests of our users and to enhance the experience of our services on our website(s).

Some of the Company's business partners use cookies on the Company's website(s). The Company has no access to, or control over these cookies.

The Company Client or website visitor can control, manage and delete all cookies through web browser's privacy settings.

## 8. DISCLOSURE OF PERSONAL DATA

The Company reserves the right to disclose your personally identifiable information as required by law 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 on our Web site.

The Company will not be liable for misuse or loss of personal information resulting from cookies on the Company's website(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, however contacted.

## 9. CONFIDENTIALITY OBLIGATIONS

Client information which the Company holds is to be treated by the Company as confidential and will not be used for any purpose other than in connection with the provision, administration and improvement of the Services, for research and statistical purposes and for marketing purposes (if the Client's consent is obtained where he is a natural person) and as provided for under the paragraph below.

Information already in the public domain, or already possessed by the Company without a duty of confidentiality will not be regarded as confidential.

The Client agrees that the Company has the right to disclose Client information (including recordings and documents of a confidential nature, card details, personal details) in the following circumstances:

- a. where required by law or a competent Court;
- b. where requested by any other regulatory authority having control or jurisdiction over the Company or the Client or their associates or in whose territory the Company has Clients;
- c. to relevant authorities to investigate or prevent fraud, money laundering or other illegal activity;
- d. to execution venues or any third party as necessary to carry out Client Instructions or Orders and for purposes ancillary to the provision of the Services;
- e. to credit reference and fraud prevention agencies, third authentication service providers and other financial institutions for credit checking, fraud prevention, anti-money laundering purposes, identification or due diligence checks of the Client. To do so they may check the details the Client supplied against any particulars on any database (public or otherwise) to which they have access. They may also use Client details in the future to assist other companies for verification purposes. A record of the search will be retained by the Company;
- f. to the Company's 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 the Company collect, storage, process and use Client information or get in touch with the Client or improve the provision of the Services under this Agreement;
- h. to data reporting service providers;
- i. to other service providers for statistical purposes in order to improve the Company's marketing, in such a case the data will be provided in an aggregate form;
- j. to market research call centers that provide telephone or email surveys with the purpose to improve the services of the Company;
- k. where necessary in order for the Company to defend or exercise its legal rights;
- l. at the Client's request or with the Client's consent;
- m. to an Affiliate of the Company.

## 10. RIGHT OF ACCESS

In compliance with the Law, every user is granted a number of rights in relation to their Personal Data. There rights include accessing and/or amending your Personal Data, putting a stop to the processing on this data and preventing undesirable marketing.

Under the Law, you have (subject to certain exceptions) the right to request any personal data the Company holds about you and to inform the Company of any perceived inaccuracy. We may charge a fee to cover the associated administrative costs.

You are not obligated to provide any of the personal data requested by the Company. In the absence of this information, however, the Company may not be able to open an account for you, or to provide you with any other services, information or assistance you have sought.

## 11. CHANGES IN THIS PRIVACY STATEMENT

The Company reserves the right to make changes to this Privacy Policy from time to time for any reason and will notify you of such changes by posting an updated version of this Privacy Policy on this website. You are responsible for regularly reviewing this Privacy Policy and if you use this website after any such changes are published, such use shall constitute your agreement to such changes.

## 12. CONSENT

By accessing this website, you consent to the Company collecting, maintaining, using and disclosing personal data about you and provided by you or by another person as in accordance with this Privacy Policy.

## 13. DATA AND GDPR

According to the General Data Protection Regulation (EU) 2016/679 (GDPR) the client of the company and the visitor of the company's website (data subjects), whose data are collected, used, stored, processed and handled by the company shall have the following rights related to data:

### **1. 1. Right of access**

The data subject shall have the right to obtain from the company confirmation as to whether or not personal data concerning him or her are being processed, and, where that is the case, access to the personal data and relative information. The Company shall provide the data subject with a copy of his/her Personal Data if requested.

### **2. 2. Right to rectification**

The data subject shall have the right to obtain from the company without undue delay the rectification of inaccurate personal data concerning him or her.

### **3. 3, Right to erasure (right to be forgotten)**

The data subject shall have the right to obtain from the company the erasure of personal data concerning him or her without undue delay and the company shall have the obligation to erase personal data without undue delay.

### **4. 4. Right to restriction of processing**

The data subject shall have the right to obtain from the company restriction of processing in case that:

- a. the accuracy of the personal data is contested by the data subject;
- b. the processing is unlawful, and the data subject opposes the erasure of the personal data and requests the restriction of their use instead;
- c. the company no longer needs the personal data for the purposes of the processing;
- d. the data subject has objected to.

### **5. 5. Right to data portability**

The data subject shall have the right to receive the personal data concerning him or her, which he or she has provided to the company, in a structured, commonly used and machine-readable format.

### **6. 6. Right to object**

The data subject shall have the right to object, on grounds relating to his or her particular situation, at any time to processing of personal data concerning him or her.

**7. 7. Rights related to automated individual decision-making, including profiling** The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her. This shall not apply if the decision is necessary for entering into, or performance of, a contract between the data subject and the company and the company or the decision is based on the data subject's explicit consent.

## **14. ENQUIRIES**

If you have any inquiries regarding this "Privacy Policy" please inform us by emailing our Customer Support at [support@phoenix4x.com](mailto:support@phoenix4x.com)