

Affiliate Program - Privacy Policy

AT Global Markets Limited (ATFX)

Affiliate Program - Privacy Policy Agreement v 1.0 October-2018



Privacy Policy

This website (<u>www.atfxpartners.com</u>) is operated by **AT Global Markets Limited** ("we, us or our"). It is our policy to respect the confidentiality of information and the privacy of individuals. We comply with our legal obligations in relation to applicable data protection law. The purpose of this ATFX Affiliate Program - Privacy Policy Agreement is to set out how we handle personal information about our Affiliates as part of our Affiliate Program.

Protecting the privacy and safeguarding the personal and financial information of our Affiliates is one of our highest priorities. The following privacy policy agreement explains what personal data we collect, why we need that data, how we use that data, the conditions under which we may disclose that data to others and how we keep that data secure.

What personal data do we collect?

The personal data you are requested to provide us includes: **your first and last name, your email address, mailing address, financial information for payments processing, a copy of government issued ID, company information and alike**. We maintain personal data as a result of your website usage, for example when you visit our website, login to your account or use our services. We also record and monitor communications with you for our internal compliance requirements.

How do we process personal data?

In order to perform our contractual obligations under the affiliate program, we may use the personal data you have provided us for the following purposes:

- to set up and manage your affiliate account;
- to respond to any queries you submit;
- to help us managing our relationship with you, for example, to provide you the latest information about products and services of ATFX with new functionality, which may be of interest to you;
- to notify you about any disruptions to our services (system messages);
- tto ensure that we are appropriately recording user traffic which you direct to the ATFX platform pursuant to the ATFX Affiliate Program and pay you the correct affiliate fees;
- to perform legal or regulatory obligations and requests anywhere in the world, including reporting to and/or being audited by national and international regulatory bodies and to comply with court orders and exercise and/or defend our legal rights.

It may be necessary for you to provide us with your personal data and enable us managing our operations, providing services to you, or complying with our statutory obligations. It will be at your discretion whether you provide us with personal data or not. However, please note that where you do not supply any of the personal data we request, we may be unable to maintain you as an affiliate under the ATFX Affiliate Program.

We make every effort to maintain the accuracy and completeness of your personal data which we store and to ensure all of your personal data is up to date. However, you can assist us with this considerably by promptly contacting us if there are any changes to your personal data or if you become aware that we have inaccurate personal data relating



to you. We will not be responsible for any losses arising from any inaccurate, inauthentic, deficient or incomplete personal data that you provide to us.

Use of "Cookies"

When you visit our website or use our services, we may use information obtained about you by accessing cookies. Cookies are small pieces of text stored on your computer when you visit a website, which may include a unique identification number. By using cookies, we are aimed to provide you with a more relevant and effective experience on our website(s), including the presentation of our web pages according to your needs or preferences.

We respect your privacy and are committed to providing you with the information you need to manage your cookies. There are three types of cookies on this website, which include essential cookies, behavioural and analytical cookies, and marketing cookies.

Essential cookies are necessary for the vital functions of our site and trading platform. If these are disabled, you won't be able to access the platform or other important parts of the site. Behavioural and analytical cookies help us provide you with a better service. They can tailor site content to your personal preferences and past behavior, or remember your saved settings. Marketing cookies enable you to experience more relevant online content and see adverts which are aligned with your interests, as indicated by your activity on our site.

If you wish to delete any cookies that are held on your computer, please refer to the instructions for the file management software of your computer to locate the file or directory that stores cookies. If you want to stop cookies being stored on your computer in future, please refer to your browser manufacturer's instructions by clicking "help" in your browser menu. Further information on deleting or controlling cookies is available at <u>www.aboutcookies.org</u>.

Please note that by deleting our cookies or disabling future cookies, you may not be able to access certain areas or features of our website or services.

Who gets to see your personal data

We do not and will not sell, rent out or trade your personal data. We will only disclose your personal data in the ways set out in this Affiliate Privacy Policy and in the following circumstances:

- to any of our group and related companies;
- to any third party who process your personal data on our behalf (such as our system providers);
- to any third party to whom we assign or novate any of our rights or obligations; and/or
- to any government, regulatory agency, enforcement or exchange body or court where we are required to do so by applicable law or regulation or at their request.

How we protect your personal data

We are committed to safeguarding and protecting your personal data and will implement and maintain appropriate technical and organisational measures to ensure a level of security appropriate to protect any personal data provided to us from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to Personal Data transmitted, stored or otherwise processed.

AT Global Markets Limited (ATGM, Registration Number 24226 IBC 2017) E: partner@atfxpartners.com, W: www.atfxpartners.com



Your rights in relation to the personal data we collect

You have the right to access your data, have updated and modified any inaccuracies in the details we hold about you, obtain a copy of the information held by us about you, and the right to block any specific uses of your data. Moreover, you also have the right to restrict or stop us from using any of the personal data which we hold on you, including by withdrawing any consent you have previously given to the processing of such data.

To be raised any of the requests mentioned above, you can write to **AT Global Markets Limited through** <u>info.gm@atfx.com</u>. We endeavour to respond to such requests within a month or less, although we reserve the right to extend this period for complex requests.

In any of the requests listed above, you may need to prove your identity by providing us with a copy of a valid means of identification in order for us to comply with our security obligations and to prevent unauthorised disclosure of data. We reserve the right to charge you a reasonable administrative fee for any manifestly unfounded or excessive requests concerning your access to your personal data, and for any additional copies of the personal data you request from us.

If you request that we delete or stop using your personal data, this may imply that we are unable to continue to provide products or services to you or your business.

How long we will hold your personal data for

We store personal data for as long as we find it necessary to fulfil the purpose for which the personal data was collected, while also considering our need to answer your queries or resolve potential problems, to comply with legal requirements under applicable laws, to attend to any legal claims/complaints, and for safeguarding purposes.

This means that we may retain your personal data for a reasonable period of time after your last interaction with us. When the personal data that we have collected is no longer required, we will delete it in a secure manner. We may process data for statistical purposes, but in such cases, data will be anonymized.

Changes to this Affiliate Privacy Policy

This Affiliate Privacy Policy will be reviewed and revised from time to time to take account of changes to our operations or practices and, further, to make sure it remains appropriate to any changes in law, technology and the business environment. Any information held will be governed by our most current privacy policy of the affiliate program. If we make any changes we consider to be important, we will let you know by placing a notice.

This document was last updated on October 2018.