



# **IFCM CYPRUS LIMITED**

## Privacy Policy

September 2021



## **PRIVACY POLICY**

### **INTRODUCTION**

The purpose of establishing this Privacy Policy is the protection and safety of our Clients' personal and private financial information. By signing an agreement with IFCM Cyprus Limited (former Infin Markets Limited) (hereafter "the Company"), the Client provides his consent to the collection, processing and use of personal information by the Company as described below. Whilst the Company attempts to ensure that all information collected are accurate and complete, Clients shall immediately contact the Company if any of Clients' personal details have changed.

### **SCOPE**

This Policy applies to IFCM Cyprus Limited and their employees and extends to all processing of personal data, relating to an identified or identifiable person. Anonymised or pseudonymised data is not subject to this Policy.

### **LEGAL FRAMEWORK**

We inform you that, pursuant to Legislative Decree 196/2003 laying down rules for the protection of persons and other subjects regarding the processing of personal data, IFCM Cyprus Limited is the data controller of the personal data provided by our Clients.

The processing of our clients' personal data is necessary for performance of a contract with Client or in order to take steps prior to entering into a contract with Client at his request (Article 6, 1., (b) of the GDPR, as of 25 May 2018);

The processing is necessary for the purposes of our legitimate interests or our affiliates' or other third parties' legitimate interests, and such interests are not overridden by our Clients' interests or fundamental rights and freedoms (Article 6, 1., (f) of the GDPR, as of 25 May 2018); The legitimate interests that we pursue notably include our interest to manage and maintain the contractual relationship with our Clients, to answer to clients specific requests, to ask feedback in order to improve our Site and our products, or to pursue other general marketing activities.

Where Clients' specific consent is required to the processing of Clients' personal data as described herein, the personal data will be processed based on such consent (Article 6, 1., (a) of the GDPR, as of 25 May 2018);

This Policy comprises the accepted international and European data privacy principles without replacing existing national laws. It supplements national data privacy laws in



each jurisdiction where IFCM Cyprus Limited operates. The relevant national law will take precedence in the event of conflict with this Policy or where it has stricter requirements. The Policy must also be observed in the absence of corresponding national legislation.

## **PERSONAL DATA PROCESSING**

### Principles for Processing

All processing carried out by IFCM Cyprus Limited or its employees shall be carried out in accordance with the principles enshrined in the GDPR, being the following:

1. Fairness and lawfulness
2. Limited to purpose of collection (Purpose Limitation)
3. Transparency
4. Data minimisation
5. Storage Limitation and Deletion
6. Factual accuracy
7. Confidentiality and integrity of Personal Data
8. Accountability

This privacy policy ("Privacy Policy") applies to any collection and processing of personal data carried out:

(i) When you interact with the website <https://robo.ifcmarkets.eu/> (the "Site") operated by IFCM Cyprus Limited, address: 38 Spyrou Kyprianou, 2nd Floor, Office 101-102, Germasogeia, Limassol, Cyprus.

Tel.: +357 25 760 925

Fax: +357 25 363 506

Email: [info@ifcmarkets.eu](mailto:info@ifcmarkets.eu)

(ii) When you purchase services from IFCM Cyprus Limited (hereinafter, "we" or "us" or "IFCM"), whether online on our Site or offline on phone, emails, including your communication with our customer service;

(iii) When we communicate with you as part of our marketing activities.

By accessing and using this Site or otherwise providing us with your personal data, for example when contacting our customer service, you confirm that you have read and that you understand the way we collect, process, use and disclose your personal data as described in this Privacy Policy.

For specific processing activities, we need to obtain your consent to collect and process your personal data. When we need your consent, we will ask you, before you submit personal data or use the relevant sections of the Site, to confirm electronically that you consent to the processing activity at stake, as described in this Privacy



Policy, by ticking specific boxes. Your affirmative action in ticking the relevant box and your use of this Site signify that you agree to the processing activity at stake as described in this Privacy Policy. Our records of your acceptance of this Privacy Policy, the date thereof, and of all future amendments to this Privacy Policy, shall be regarded as conclusive and written evidence of your consent.

You will also be informed of this Privacy Policy - and, when a specific processing activity requires your consent, be asked to consent - when contacting our customer service or when providing us with your personal data by email or in Personal Area.

We collect and process your personal data in accordance with all applicable data protection laws and regulations, including, without limitation, the laws promulgated on the matter by the European Union, such as the Directive 95/46/EC on the protection of individuals with regard to the processing of personal data and on the free movement of such data and all the laws promulgated in the EU Member States, as well as the orders and guidelines issues by the competent data protection authorities, as applicable, and the General Data Protection Regulation (EU) 2016/679 of 27 April 2016 ("GDPR") and supplementing national provisions applicable as of 25 May 2018 (the "Data Protection Laws").

Company considers all the information about the Client to be confidential including the time following the termination of the Client Agreement.

## **ACCESS TO PERSONAL DATA and DISCLOSURE OF DATA**

Access to Personal data information is restricted to persons who need to know that information in order to provide services to the Client. The Company maintains physical, electronic and procedural controls to safeguard such information. These controls are reasonably designed to:

- I. Ensure the security and confidentiality of the customer's records and information; (ii) protect against any anticipated threats or hazards to the security or integrity of the customer's records and information;
- II. Protect against unauthorized access to or use of customer's records or
- III. Information that could result in substantial harm or inconvenience to the customer.

The Company will not reveal any Client's personal information to any third parties, except for the following cases:

- 1) When the Company is forced to do so by a regulatory authority of the competent jurisdiction,
- 2) When such disclosure is essential to safeguard the interests of the Company,
- 3) Following the Client's request or when Client provides his consent.



The collected information will be used exclusively for the services, which customers subscribed to use. The Company will not request more information than is necessary for providing the service to customers.

The Company's employees, directors, officers and representatives treat personal data as confidential and may not pass on or use any such data without valid legal grounds

The Client understands and agrees that the Company can keep (electronically or in any other way) any kind of stored information about the Client and that this information can be used to monitor the Client's advised portfolio in order to provide any kind of services to the Client, to evaluate any limit of the credit and perform statistic and other analyses.

The Company may also reveal the information about the Client to its partners, affiliates, people who provide services to the Company or work as its agents, to any person the Company gives any of its rights or responsibilities under the present contract or to agencies and other organizations that help the Company to prevent fraud and to perform credit control. Such disclosure shall occur on a need-to-know basis and the Company shall expressly inform the third party regarding the confidential nature of the information.

Personal data collected through our Site as part of our services and as part of our customer service are stored on the servers provided and managed by our third-party storage and hosting providers. All these personal data may be shared with recipients as detailed below.

We communicate personal data within the limits and under the circumstances specified in this Privacy Policy, subject to your specific consent when required under applicable Data Protection Laws:

1. Your personal data will be accessible within our organization by the internal and external personnel that need to access it because of their duties in relation to the processing purposes herein specified. We ensure that these persons are held by appropriate security and confidentiality duties.
2. Your personal data may also be accessible by third-party service provider that we appoint to process personal data on our behalf and on our instructions (as Processors). These Processors include:
  - third-party service providers to which we may revert to for performance of professional, technical and organizational services functional to the managing of the Site and the activities performed therein, such as for example the funds transfers and related activities, the managing of functionalities offered by the Site and of the initiatives and services that you may subscribe to and require through the Site, and for services strictly functional to achievement of the other processing purposes herein specified;



- third-party service providers that are managing and supporting the Site, performance marketing, financial services and customer relationship management;

A list of these Processors, with indication of where they are located, is available at our company web-site or upon request. These Processors are bound by appropriate contractual obligations to implement adequate security measures to protect security and confidentiality of personal data.

3. Your personal data may also be shared with institutions, authorities, public entities, banks and financial institutions, professionals, independent consultants, also in associate form, business partners or other legitimate recipients as permitted by applicable laws and regulations, for example in case of judicial processes, request by competent courts and authorities or other legal obligation, to protect and defend our rights and property and the Site.
4. Lastly, we may also communicate your personal data to third parties in case of mergers, acquisitions, transfers of any of our assets, products, websites or operations.

Except for the foregoing, personal data will not be shared with third-parties, natural persons or legal entities, that are unrelated to, or that do not perform a business, professional or technical function for us.

Personal data will not be communicated to third parties for their own marketing purposes.

Such transfers take place on the processing bases identified in Section 3 above.

These abovementioned recipients may be located in countries other than the country in which personal data was originally collected, it being noted that your personal data will in principle only be transferred within the European Economic Area or other countries recognized by the EU Commission as adducing an adequate level of protection of personal data.

In case any of the above recipient is established in a country outside the EEA that is not covered by an adequacy decision of the European Commission and therefore does not provide the same level of protection for your personal as in the EEA, we shall implement appropriate safeguards, including, but not limited to, relevant data transfer agreements based on the EU Commission Standard Contractual Clauses for the transfer of data to third countries (Article 46, 2., (c) of the GDPR, as of 25 May 2018) or binding corporate rules (Article 47 of the GDPR as of 25 May 2018). A copy of these appropriate safeguards may be obtained by contacting our Privacy Officer at [info@ifcmarkets.eu](mailto:info@ifcmarkets.eu).



## **MARKETING AND COMMUNICATION**

Messages, reports, notifications and other information from the Company can be transferred to the Client by:

- 1) publishing it on the Company's web-site
- 2) via email to the email address provided by the Client during the completion of the questionnaire
- 3) by post service

Any outgoing correspondence of the Company is considered to be sent to the Client once it is received by transferring or delivering services providers or when the information is sent via transferring agent (internet-provider for instance) for a further transfer to the Client no matter if it is received by the Client or not. Ingoing correspondence is considered to be delivered when it is received by the addressee in the Company.

The Client must inform the Company on any changes connected with the post address, email address or other contact information immediately via email at [advice@ifcmarkets.eu](mailto:advice@ifcmarkets.eu)

## **USE OF COOCKIES**

The Company uses cookies to collect information. Cookies are small text files that are stored on a user's computer for record-keeping purposes. Cookies are useful in the sense that they can store session IDs, filled form fields, pages visited, frequency of visits etc. This helps in making navigation through our website a much easier and efficient process. It also helps the company in gathering data for future logistical and statistical analysis. It is noted that the company does not use cookies to retrieve any data that was not originally sent by a cookie, nor does the company uses cookies for any promotional or marketing material without the users' consent.

## **CONTACTS**

Customer Service Department  
E-mail: [advice@ifcmarkets.eu](mailto:advice@ifcmarkets.eu)  
Tel: +357 25 760 925  
Fax: +357 25 363 506