



**FFINEU**  
investments limited

Appendix № 12  
to the General Terms of Business

## PRIVACY POLICY



This Privacy Policy sets out the way Freedom Finance Europe Ltd (hereafter “The Company”) collects, uses and manages personal information from its visitors, potential and active clients through the Company’s website. The Company is committed to safeguard the information it collects, uses and/or holds.

### **Personal Information**

In order to receive more information, register for a demo account, open a trading account with us or for any other business relationship, you are requested to complete the Application Form. By completing the Application Form and providing your personal information, you enable us to evaluate the application and comply with laws and regulations governing the provision of financial services. The same information will be used by the Company to contact you regarding the offered services.

The Personal Data collected by the Company might include, but not limited to:

- personal information you provide to us on applications and other forms, such as your name, address, date of birth, Social Security number and occupation;
- financial information such as your income, assets and financial investment experience;
- documents that you provide to us to verify your identity, such as your passport, utility bills and/or bank statement or your company incorporation details.

The Company is obligated by the present regulations to keep your Personal Data on record for a period of five years which is calculated after the execution of the transactions or the termination of the business relationship.

### **Data Protection**

Any client’s personal data is kept by the Company according to the Processing of Personal Data (Protection of the Individual) Law of 2001, its amendment (Law No. 37(I)/2003) and the Regulation of Electronic Communications.

The Company shall not disclose to a third party, any of its clients’ confidential information unless required to do so by a regulatory authority of a competent jurisdiction; such disclosure shall occur on a ‘need-to-know’ basis, unless otherwise instructed by a regulatory authority. Under such circumstances, the Company shall expressly inform the third party regarding the confidential nature of the information.

Any personal information is treated as confidential and may be shared only within the Company, by its employees and affiliates for business purposes, as permitted by the applicable law. The information may be disclosed to third parties, such as the Companies Partners and Affiliates for business purposes only, such as, but not limited to, servicing Client accounts and informing Clients about new products and services. Our company partners, affiliates, and Business Introducers maintain the privacy of your information to the same extent the Company does in accordance with the policy. Information may also be provided to non-affiliated companies, providing professional, legal, and accounting services. Non-affiliated companies that assist the Company in providing services to you are required to maintain the confidentiality of such information and to use your personal information only in the course of providing such services for the purposes that the Company dictates and within the ambit of the applicable law.

The Company will not sell or give away your name, mail address, phone number, email address or any other information to anyone. The Company will use various security measures to protect your information from unauthorized users.



Clients accept and consent that the Company may, from time to time, contractually engage companies for statistical purposes in order to improve the Company's marketing; as a result, some or all of the clients' personal data may be disclosed on an anonymous and aggregated basis only.

The Company may use your personal information for one or more of the following purposes:

- to confirm your identity;
- to assess your appropriateness to the products and services we provide;
- to process your transactions;
- to provide you with transaction and post transaction related services;
- to inform you of products and/or services that may be of interest to you;
- to keep you updated on the issues that are relevant to your business relationship with us;
- to analyse statistical data to enable us to provide you with better products and/or services;

### **Cookies**

When using Company's Web Site, we may use cookies to collect information. A cookie is a small data file that is stored on your computer, for the purpose of making it easier for you to navigate the Web Site by for example remembering your IDs, passwords and viewing preferences, thus allowing you to visit member-only areas of the Web Site without logging in again. You can set your web browser to inform you when cookies are enabled, or to disable cookies. If you do not wish to receive cookies, most web browsers will permit you to decline/disable cookies and in most cases will still allow you complete access to our Site.

### **Tracking systems**

Tracking systems used on the Company site(s) may collect data detailing the pages you have accessed, how you discovered this site, the frequency of visits etc; this information is obtained in order to improve the content of the Company's web site and may also be used to contact you, through any appropriate mean, and provide you with any information the Company believes to be useful to you.

### **Security**

The privacy and confidentiality of your personal information is of fundamental importance to us. We take all appropriate security measures to protect against unauthorised access to or unauthorised alteration, disclosure or destruction of data and personal information.

We restrict access to personal information to employees who need to know the specific information in order to operate, develop or improve our services. These individuals are bound by confidentiality and will be subject to penalties if they fail to meet these obligations.

### **Legal Disclaimer**

The Company reserves the right to disclose your personally identifiable information as required by rules and regulations 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. The Company will not be liable for misuse or loss of personal information resulting from cookies on the Company's site(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.

### **CHANGES OF PRIVACY STATEMENT**



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The Company reserves the right to change or amend the Privacy policy without further notice to you, provided that the changes do not significantly reduce your rights under this Policy. If we make material changes to this policy, we will notify you by email or by means of a notice on our home page. The latest and prevailing version of this Policy will at all times be available at [www.ffineu.eu](http://www.ffineu.eu). Any revised Policy will be effective immediately upon posting on our Web Site.

Should you have any additional questions or concerns regarding this Policy, please kindly contact us at any time at [info@ffineu.eu](mailto:info@ffineu.eu) or call us at (+357-22282929)