



FINMARKET.COM

Your Gateway to the Financial Market



CONNECTION
ANALYSIS
DATA

WWW.FINMARKET.COM

Privacy & Cookie Policy

FINMARKET is a brand name owned and operated by K-DNA Financial Services LTD (hereinafter called the “Company” or “K-DNA Financial Services LTD”, “us”, “we”), regulated company by the Cyprus Securities and Exchange Commission license 273/15, incorporated and registered under the laws of the Republic of Cyprus, registration No. 335683, registered office at 56 Griva Digeni Avenue, Anna Tower, 1st Floor, 3101, Limassol, Cyprus.

This policy forms a part of the Client/Company agreement, and therefore by accepting this agreement with the Company you also agree to the terms of this Policy, as set out in this document.

For the purpose of the General Data Protection Regulation (GDPR) 2016/679, We act as the data controller.

Our Commitment to You

We understand the importance of maintaining the confidentiality and privacy of your information. By entrusting us with your Personal Information, we assure you of our commitment to keep such information private & secured. We have taken measurable steps to protect the confidentiality, security and integrity of your information.

Collection of Information.

If you decide to apply to opening a real/demo account with us (or in any other circumstances that is deemed necessary as a part of our course of business relationship) you become our Client, and therefore we require certain information given by you, in order to enable this engagement.

We may collect your information directly from you (through your completed Account Opening Application Form or by other way) or by other persons, for example, credit reference agencies, fraud prevention agencies, banks, other financial institutions, third authentication service providers and public registration providers. This information includes, but isn't limited to personal details provided to us through the application form or other forms, which include without limitation: your name, address, date of birth, contact details, payment details including credit card, debit card and bank account details, and financial details such as estimated annual income, net worth, your trading experience, investment knowledge, information from documents

you provided us in order to verify your identity, such as your passport, utility bills, and/or bank statement, or your company incorporation details.

Data retention

We have a legal obligation to keep records of the aforesaid details for a period of at least 5 years, which shall be calculated after you have been accepted as a Client in accordance with our Client Agreement, or after the termination of our business relationship.

The period for which we will retain Personal Information will vary depending on the purposes it was collected for, as well as the requirements of any applicable law or regulation. The retention of your Personal Information will be subjected to periodic review. We may keep an anonymized form of your Personal Information, which will cease referring to you indefinitely, to the extent of our legitimate and lawful interest in it.

Use of cookies

The Company uses cookies to gather information about your access to FINMARKET website and other services we provide to you. Cookies are small pieces of information which use a unique identification tag and are stored on your device following your usage of FINMARKET website, or other services we provide to you. Most internet browsers are set up to accept cookies.

If you do not wish to receive cookies, you may be able to change the settings of your browser to refuse all cookies or to have your computer notify you each time a cookie is sent to it, and thereby give you the choice whether to accept it or not. However, this may impair the quality of the services we provide to you in relation to your account. The Client agrees and acknowledges that the company may use and collect existing or/and future information, in order to treat you fairly, understand your financial objectives, ensure that relevant services are offered to your profile, as well as to improve the services we are providing you and inform you of additional products, new services, promotional offers or any other marketing information. Alternatively, you may wish to visit <http://www.aboutcookies.org/>, which contains comprehensive information on how to manage cookies on a wide variety of desktop browsers. If you use our web services without blocking cookies, you hereby consent to the cookies.

Use of Information

We will use, store, process and handle your personal information in connection with the furtherance of the Agreement between us, in accordance to all applicable laws as amended or replaced from time to time. 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, and will not be used for any purpose other than the provision, administration and improvement of our services to you. This applies also to the furtherance of our Client/Company Agreement, establishing and managing your account or relationship between us, reviewing your ongoing needs, enhancing customer service and products, providing ongoing information or opportunities that we believe may be relevant to you, improving our relationship, anti-money-laundering policy and due diligence checks, for research and statistical purposes and for marketing purposes (according to Client/Company Agreement), as presented. The information may be disclosed to third parties, such as the Company Partners and Affiliates for the purposes stated above only. Our Company Partners, Affiliates, and Business Representatives maintain the privacy of your information to the same extent the Company does in accordance with this policy. Information may also be provided to non-affiliated companies, providing technological services, payment services, professional services, legal services, and accounting services. Non-affiliated companies that assist the Company in providing services 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 the Company dictates, and within the ambit of the applicable law.

By entering an Agreement with us (to become our Client), you will be consenting to the transmittal of your Personal Information outside the European Economic Area, according to the provisions of GDPR.

The Company will use various security measures to protect your information from unauthorized users.

The account information (Client account) will be secured by a password, which will be encrypted and known only to the Client.

Contacting You

We may occasionally initiate direct contact with you by telephone, fax, email, post etc., for the purpose of administering the terms of our Agreement between us. As long as you agree, we or any of our Affiliates or any other Affiliates in our group, initiate such contact with you for marketing purposes to bring to your attention

products or services that may be of interest to you, as well as for purposes of market research.

Disclosure of Information to external parties

Following the Agreement between us, we have the right to disclose Your Information (including recordings and documents of a confidential nature, card details) in certain circumstances. According to the Agreement between us, Your Information may be disclosed:

(a) As required by law or a court order of a valid Court;

(b) As requested by our Supervisor (the Cyprus Securities and Exchange Commission) or any other regulatory authority having control or jurisdiction over us, over you, our associates or the territory we maintain Clients or Providers, as applicable;

(c) to relevant authorities to investigate or prevent fraud, money laundering or other illegal activity;

(d) a Broker to execute your Instructions and for purposes ancillary to the provision of our Services to you as our Client;

(e) to credit reference and fraud prevention agencies, third authentication service providers, banks and other financial institutions performing credit checking, fraud prevention, anti-money laundering purposes, identification or due diligence checks. To do so they may check the details you supplied against any particulars on any database (public or otherwise) to which they have access. They may also use your details in the future to assist other companies for verification purposes. A record of the search will be retained by us;

(f) to our 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 obligations herein 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 us collect, storage, process and use Your Information or get in touch with you, or improve the provision of our Services or activities under the Agreement between us;

(h) to a Trade Repository or similar;

(i) to other service providers for statistical purposes in order to improve our 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 of improving our Services or activities (specified contact details only);

(k) to where is necessary in order for us to defend or exercise our legal rights to any court/tribunal/arbitrator/Ombudsman/governmental authority, as the case may be;

Safeguard Measures

Your Information is stored upon secure servers. We limit access of Your Information only to the employees or partners that need to know the information in order to enable the execution of the Agreement between us. We have procedures in place regarding how to safeguard and use Your Information, for example, by requesting our Affiliates and employees to maintain the confidentiality of Your Information. We will not keep Your Information for any longer than is required. In many cases, information must be kept for considerable periods of time. Retention periods will be determined considering the type of information that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable time. Under Applicable Regulations, we will keep records containing Clients' personal data, trading information, account opening documents, communications and anything which is Client related, for at least five years after termination of the Agreement between us. In any event, we will keep Your Information for the duration of applicable Limitation of Actions Laws as a minimum. While we will use all reasonable efforts to safeguard Your Information, you acknowledge that the use of the web is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data transferred from you, or to you via the internet.

Security and policy for transmission of payment card details

In accordance with the recommendations of Payment Card Industry Security Standards Council, customer card details are protected using Transport Layer encryption – TLS 1.2 and application layer with algorithm AES and key length 256 bit.

Our legal basis for using your Personal Information

Implementing the contract with you: If you have an account or have registered to the Site or service, our legal basis for processing your Personal Information is that it is necessary for the performance of the relevant terms and conditions, terms of business

and/or terms of use, as the case may be, in order to provide a service to you. With respect to the account, this includes facilitating access to our platform, processing payments and executing trades.

For other justifiable grounds, including legal obligation and legitimate interests: We process your Personal Information where necessary for the Company to comply with legal and regulatory obligations, and where it is necessary for legitimate interests we have in conducting our business. These include:

- Learning about your interests and preferences to contact you with information that is relevant to you, as it helps us maintain promotional communications with you.
- Analyzing and continually improving our Site and services as we run pilot test versions of the Site internally, in order to develop new features and ensure the efficiency of our services.
- Detecting and reducing fraud and credit risk.

Minors/Legally Underaged

Our services are not available for users under the age of 18, also known as "minors" (or the age of legal consent for the jurisdiction the user is in). We do not knowingly collect Personal Information from or about minors. If you are a minor, you should not download or use any of our services nor provide any Personal Information to us.

In case we detect that a minor has shared any information with us, we will delete such information. If you have any reason to believe that a minor has shared any information with us, please contact us at privacy@FinMarket.com.

The following disclosure about your rights as EU resident is made pursuant to the European General Data Protection Regulation (GDPR):

Updated Information

You may inform the Company at any time that Your Information has changed or that you wish the Company to delete information gathered about you by emailing us at privacy@FinMarket.com. We will change or delete Your Information in accordance to your instructions, except in cases we are required to hold Your Information for regulatory or legal purposes, to provide you with the Services you have requested, or to maintain adequate business records.

Receiving promotional materials:

You can request to opt out from promotional emails by clicking on the “unsubscribe” or “opt-out” link in the promotional e-mails we send you. You will still receive operational emails as needed by regulatory or other purposes.

In case you do not want to get any promotional emails or other promotional communications you should send a request to privacy@FinMarket.com

Right of Access and Portability

Under the GDPR, as occasionally amended or replaced, you have the right to obtain a copy of any Personal Information, which we hold relating you, and to advise us of any perceived inaccuracy. To make a request, please contact us, verify your identity and specify what information you require. You may contact us via e-mail at privacy@FinMarket.com

Right of Objection

You hold the right to object to have your Personal Information disclosed to our affiliates or other third parties as described in this Policy. You may contact us on any request via e-mail at privacy@FinMarket.com. We will review and address your request except to the extent required to process your Information for regulatory or legal purposes, to provide you with the Services you have requested or to maintain adequate business records.

The right to complain

You hold the right to complain about the use of your Personal Information to the Supervisory Authority which in Cyprus, addressing the Office of the Commissioner for Personal Data Protection.

Restricted responsibility

K-DNA Financial Services LTD is not responsible for third party websites which are linked to www.FinMarket.com and has no control of the use or the protection of the information presented there. Each time a Client is required to provide information for a linked website which acts as a third party website, the information is recorded by the third party and under their responsibility.

Consent

By visiting and/or accessing FINMARKET related websites and applications, you give your consent to FINMARKET to collect, maintain and use your Personal Information as per this policy.

Privacy Policy Updates

K-DNA Financial Services LTD reserves the right to update the privacy policy whenever it is deemed to be appropriated.

The update will be posted in FINMARKET website, as the Client accepts posting of updated privacy policy, which is given as official notice to the Client.

K-DNA Financial Services LTD encourages the Client to follow updates regarding privacy policy agreement and other agreements under the legal documentation section.

In case of further questions or information, requests or complaints, please do not hesitate to contact us at privacy@FinMarket.com.

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