

PRIVACY POLICY

1. Our Commitment to You

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

2. Collection of Information

If you decide to apply for opening an account with us and thereafter to become our Client, there is certain information, which we will require from you, in order to complete your request.

We may collect Your Information directly from you (in your completed Account Opening Application Form or other way) or from other persons including, for example, credit reference agencies, fraud prevention agencies, banks, other financial institutions, third authentication service providers and the providers of public registers. This information includes, but is not limited to, personal details such as name, address, date of birth, contact details, payment details, including credit card, debit card and bank account details, and other necessary financial information.

We may also collect Your Information, in regard to your use of our website(s), such as pages visited, frequency, duration of visit and trading activities.

From time to time we may also request further information, to help us improve the Services, which we provide you with (if you are our Client), or our activities (if you are our Provider for Trading Data), under our relevant Agreement, as the case may be, or comply with Applicable Regulations.

3. Use of the Information

We will use, store, process and handle Your Personal Information (in case you are a natural person), in connection with the furthering of the Agreement between us, in accordance to the Processing of Personal Data (Protection of the Individual) Law of 2001, as amended or replaced from time to time.

Your Information (not in the public domain or already possessed by us, without a duty of confidentiality), which we hold, is to be treated by us as confidential and will not be used for any purpose, other than in connection with the provision, administration and improvement of our Services to you, or the furthering of our Agreement between us, establishing and managing your account or a relationship between us, reviewing your ongoing needs, enhancing customer service and products, giving you ongoing information or opportunities, which we believe, may be relevant to you, improving our relationship, anti-money laundering and due diligence checks, for research and statistical purposes and for marketing purposes (according to the Agreement between us), as applicable.

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 Processing of Personal Data (Protection of the Individual) Law of 2001.

67 Spyrou Kyprianou
Samos Center 2nd Floor
Office 201, Germasogeia 4042
Limassol, Cyprus

www.oxmarkets.com
info@oxmarkets.com
+357-25-250-284/85/87



M A R K E T S

4. Contacting You

We may, for the purpose of administering the terms of our Agreement between us, from time to time, make direct contact with you by telephone, fax, email, or post.

If you agree, we or any of our Affiliates of the Company or any other company in our group, may make contact with you from time to time, by telephone, fax, email or post for marketing purposes, to bring to your attention products or services, which may be of interest to you or to conduct market research.

5. Disclosure of Information

Under 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) where required by law or a court order by a competent Court;
- (b) where requested by our Supervisor (the Cyprus Securities and Exchange Commission) or any other regulatory authority, having control or jurisdiction over us or you or our associates or, in whose territory we have Clients or Providers, as applicable;
- (c) to relevant authorities to investigate or prevent fraud, money laundering or other illegal activity;
- (d) a Broker in order to execute your Instructions or Orders, 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 for credit checking, fraud prevention, anti-money laundering purposes, identification or due diligence checks of you. 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 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 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 centres, which provide telephone or email surveys with the purpose to improve our Services or activities, but only contact details;

67 Spyrou Kyprianou
Samos Center 2nd Floor
Office 201, Germasogeia 4042
Limassol, Cyprus

www.oxmarkets.com
info@oxmarkets.com
+357-25-250-284/85/87



M A R K E T S

- (k) where necessary, in order for us to defend, or exercise our legal rights to any court or tribunal or arbitrator or Ombudsman or governmental authority, as the case may be;
- (l) at your request or with your consent;
- (m) to our Affiliates or any other company in our group;
- (n) to our employees, to enable them to exercise their duties to further the Agreement between us, or to assure the efficient functioning of our Platform, the Automatic Orders and the Trading Data functions.

6. Safeguard Measures

Your Information is stored on secure servers.

We limit access of Your Information only to those employees or partners, who need to know the information in order to enable the carrying out 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 longer than it is required. In many cases, information must be kept for considerable periods of time. Retention periods will be determined taking into account the type of information, which 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 Client personal data, trading information, account opening documents, communications and anything else, which relates to the Client 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 internet 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.

7. Change of Information

You are obligated to inform the Company at any time, if Your Information has changed by emailing us at support@oxmarkets.com. We will amend Your Information, in accordance to your instructions, except to the extent, that 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.

8. Right of Access

Under the Processing of Personal Data (Protection of the Individual) Law of 2001, as amended or replaced from time to time, you as a natural person have the right to obtain a copy of any personal information, which we hold about you and to advise us of any perceived inaccuracy.

To make a request, please contact us, verifying your identity and specifying what information you require. We may charge an administrative fee.

You may contact us via e-mail at support@oxmarkets.com

67 Spyrou Kyprianou

Samos Center 2nd Floor

Office 201, Germasogeia 4042

Limassol, Cyprus

www.oxmarkets.com

info@oxmarkets.com

+357-25-250-284/85/87



M A R K E T S

9. Questions

If you have any questions regarding this policy, wish to access or change your information or have a complaint, or if you have any questions about security on our Website, you may email us at support@oxmarkets.com.

10. Update of this Policy

This Policy is subject to change without a notice. For this reason, you are advised to look for updates from time to time.

67 Spyrou Kyprianou
Samos Center 2nd Floor
Office 201, Germasogeia 4042
Limassol, Cyprus

www.oxmarkets.com
info@oxmarkets.com
+357-25-250-284/85/87

Ox Capital Markets Ltd. is a Cyprus Investment Firm, Licensed and Authorised by the Cyprus Securities and Exchange Commission (CYSEC), under License number: 274/15 and Reg. number: HE 338839, Tax Reg. number: 12338839D, located at: 67 Spyrou Kyprianou, Samos Center 2nd Floor, Office 202, Germasogeia 4042, Limassol, Cyprus.