

The protection of privacy and the safeguarding of our Clients' personal and financial information is our highest priority.

Please view the following Privacy Policy Statement which clearly explains how we, at Astra Trading LLC ("Astra Trading LLC"), collect, process, store and protect our Clients' information.

By opening an account, Client hereby consents to such collection, processing, storage and use of personal information by Astra Trading LLC as explained below.

#### 1. COLLECTION OF PERSONAL INFORMATION

Astra Trading LLC collects the necessary information required to open, transact and safeguard your assets and your privacy and to provide you with the services you require. To this end, Astra Trading LLC gathers information from you and may, in certain circumstances, gather information from relevant banks and/or credit agencies, and/or other sources which help us profile your requirements and preferences and provide better services to you.

# The information Astra Trading LLC collects may include:

- Application information Personal information you provide us in your application form, such as
  your name, address, date of birth, email address, income and income source etc. in order to
  facilitate the evaluation of your application. The information you provide us with is also used
  for the purposes of communicating with you.
- Transaction information Information about the anticipated volume and value of your transactions with us and income information provided in order to enable the construction of your economic profile.
- Verification information Information necessary to verify your identity, such as an identification card, passport or driver's license. This also includes background information we receive about you from public records or from other entities not affiliated with Astra Trading LLC.

# 2. USAGE OF PERSONAL INFORMATION/OPT OUT

- Astra Trading LLC uses personal information only as required to provide quality service and security to you. This information helps improve services, customize browsing experience and enables us to inform you of additional products, services or promotions relevant to you and the products and services you require and you consent to us using this data for such purposes.
- Although you are not required to provide Astra Trading LLC any of the personal information
  that we may request, please note that failure to do so could result in Astra Trading LLC not
  being able to open your account or provide you with the service you require.
- Whilst we attempt to ensure that all the information we hold about you is current, accurate and complete, we urge you to immediately contact us if any of your personal details have changed.

#### 3. PROTECTION OF PERSONAL INFORMATION

Any personal information you provide us will be treated as confidential and shared only
within Astra Trading LLC and its affiliates and will not be disclosed to any third party except
under any regulatory or legal proceedings.

- The personal information that you provide in connection with registering yourself as a user of OIPAX is protected in many ways. You can access your Registration Information through a password selected by you. This password is encrypted and known only to you and shall not be revealed to anyone else.
- Registration Information is safely stored on secure servers that only authorised personnel
  have access to via password. Astra Trading LLC encrypts all personal information as it is
  transferred to Astra Trading LLC and thus makes all necessary effort to prevent unauthorised
  parties from viewing any such information.

#### 4. AFFILIATES AND PARTNERS

Astra Trading LLC may share information with partners, affiliates and alliances in the event such information is reasonably required by such affiliate in order to:

- offer additional similar products and services that meet your needs and which are delivered in a manner that is useful and relevant (only where you have authorized us to do so); and/or
- service customer accounts.

#### 5. NON-AFFILIATED THIRD PARTIES

- Astra Trading LLC does not sell, license, lease or otherwise disclose personal information to third parties, except as described in this Privacy Statement.
- Astra Trading LLC reserves the right to disclose information as necessary to credit reporting or collection agencies as reasonably required in order to provide the services to you.
- To help us improve our services, Astra Trading LLC may engage third parties to help carry out certain internal functions such as account processing, fulfilment, client service, client satisfaction surveys or other data collection activities relevant to our business. Use of the shared information may also be used to provide professional, legal, or accounting advice to Astra Trading LLC. Use of shared information is strictly limited to the performance of the above and is not permitted for any other purpose. All third parties with which Astra Trading LLC shares personal information are required to protect such personal information in accordance with all relevant legislation and in a manner similar to the way Astra Trading LLC protects the same. Astra Trading LLC will not share personal information with third parties which it considers will not afford its Clients the required level of protection.
- Where you have been introduced to us by a Business Introducer, such Business Introducer may have access to your information. You hereby unambiguously and unequivocally consent to the sharing of information with such Business Introducer.
- You acknowledge that in order to provide services to you, it may be necessary for information to be transferred outside of the European Economic Area and you consent to such transfer.

# 6. REGULATORY DISCLOSURE

Astra Trading LLC reserves the right to disclose personal information to third parties where required by law, regulatory, law enforcement or other government authority of a competent jurisdiction in order to protect our rights and/or to comply with such legal proceedings. Such disclosure shall occur on a 'need-to-know' basis, unless otherwise instructed by a regulatory or other government authority. Under such circumstances, Astra Trading LLC shall expressly inform the third party regarding the confidential nature of the information.

#### 7. RESTRICTION OF RESPONSIBILITY

Astra Trading LLC is not responsible for the privacy policies or the content of sites OIPAX links to, and has no control of the use or protection of information provided by Client or collected by those sites. Whenever Client elects to link to a co-branded website or to a linked website, Client may be asked to provide registration or other information. Please note that such information is recorded by a third party and will be governed by the privacy policy of that third party.

# 8. USE OF "COOKIES"

- Astra Trading LLC uses cookies to secure your trading activities and to enhance the
  performance of the OIPAX website. Cookies used by Astra Trading LLC do not contain
  personal information or other sensitive information.
- Astra Trading LLC may share website usage statistics with reputable advertising companies and with its affiliated marketing companies. The information collected by the advertising company is not personally identifiable.
- To administer and improve the OIPAX website, Astra Trading LLC may use third parties to track and analyze usage and statistical volume information. The third party may use cookies to track behavior and may set cookies on Astra Trading LLC's behalf. These cookies do not contain any personally identifiable information.

# 9. PRIVACY STATEMENT UPDATES

From time to time, Astra Trading LLC may update this Privacy Policy Statement. In the event Astra Trading LLC materially changes this Privacy Policy Statement including how we collect, process or use your personal information, the revised Privacy Policy Statement will be posted on the website Client agrees to accept posting of a revised Privacy Policy Statement electronically on the website as actual notice to Client. Any dispute over our Privacy Policy Statement is subject to this Notice and our Customer Agreement. Astra Trading LLC encourages Client to periodically check back and review this policy so that Client always will know what information Astra Trading LLC collects, how Astra Trading LLC uses it, and to whom Astra Trading LLC may disclose it.

### 10. AGREEMENT

- I have read, understood and agree with the terms of this Privacy Policy Statement, and I confirm that I have full power and authority to be bound by the terms of this Privacy Policy Statement.
- For any other concern please Contact Us