

# Privacy Policy

IQ labs LTD (COMPANY) respects your privacy and is committed to protecting your personal data. This privacy policy aims to give you information on how we collect and process any personal data and how we look after your personal data when you visit our website (regardless of where you visit it from) and tell you about your privacy rights and how the law protects you. i.e. information about a Client (as defined below) who is a natural person on the basis of which that Client can be identified (hereinafter the **data**) in accordance with the applicable data protection legislation and best practice. This version of Privacy Policy takes effect on **November 1, 2019**.

We strive to create the most secure infrastructure of any broker in the world. In this privacy policy we would like to tell why you can trust us with your data and rest assured that your data is safe.

It is important that you read this privacy policy together with any other privacy policy we may provide on specific occasions when we are collecting or processing your data about you so that you are fully aware of how and why we are using your data.

## 1. WHO WE ARE

IQ labs LTD, is a company registered in St. Vincent and the Grenadines and having its registered address at Hinds Building, Kingstown, St. Vincent and the Grenadines (hereinafter COMPANY). COMPANY is the controller and responsible for the data of its Client disclosed to it in order to register for a Trading Account, Demo Account and/or to make use of any other services offered by the COMPANY Group (as defined in Appendix A) through the website (hereinafter "Website") (this term shall at all times include Website's desktop and mobile versions). COMPANY exercises control over the processing of data in undertakings affiliated to it and which belong to the COMPANY Group of companies.

This Privacy Policy addresses the privacy issues of the COMPANY Group so when we mention "COMPANY", "Company", "we", "us" or "our" in this Privacy Policy, we are referring to the relevant company in the COMPANY group responsible for collecting and/or processing your data when you use the Trading Platform through the Website, either for a Trading Account or a Demo Account (or their mobile/desktop versions) (hereinafter the **Service(s)**). In COMPANY we respect your privacy and therefore all companies within the COMPANY group are committed to protect your data, which it collects, uses and/or has access to.

The Company takes measures to implement advanced data protection policies and procedures and to update them from time to time for the purpose of safeguarding its Client's data and the Client's account. Your data is protected by the legal, administrative and technical measures that

we take to ensure the privacy, integrity and accessibility of data. To prevent security incidents with your data, we use a mixed organizational and technical approach based on the results of annual risk assessment.

The Company shall not divulge any private information of its Clients and former Clients unless the Client approves in writing such disclosure or unless such disclosure is required under applicable law or is required in order to verify the Client's identity or it is required for COMPANY to perform its contractual obligations under any agreement concluded with the Client. The Clients' information is processed only by the employees of the Company and/or employees of the COMPANY group and/or trusted third parties which provide specific support services, dealing with the specific Client's Accounts and necessary for the provision of our services. All such information shall be stored on electronic and physical storage media according to applicable law.

## 2. DATA USAGE

We may collect, use, store and transfer different kinds of data about you which we have grouped together as follows:

Identity Data includes first name, last name, and patronymic (if available), date of birth gender, passport, ID, Driver's number, and copy of photo.

Contact Data includes billing address, email address and telephone numbers.

Financial Data includes bank account and payment card details.

Transaction Data includes details about the transactions performed by you, details about payments, withdrawals, exchanges, trading history, profit, balance, deposited and withdrawal amount methods, and any other details in relation to the services you have made use of through our Website.

Technical Data includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in type and versions, operating system and platform, and other technologies on the devices you use to access the Website and use of cookies stored on your device.

Profile Data includes your Client's account details, username and password, transactions made by you, your interests, preferences, feedback and/or information received through your interaction with us within the course of providing our services and survey responses.

Usage Data includes information about how you use the Website, products and services, registration date, account category, trading cluster, number of complaints, number of requests filed and IP history.

Marketing and Communication Data includes your preferences in receiving marketing from us and your communication preferences.

Special Categories of Data/ 'Sensitive' Data includes details about your religious belief and/or criminal convictions and offences.

Conformity Data includes details about your education, employment status, trading experience, self-assessment test.

Banking Data includes details of number of payment wallets and/or information of your bank card, including information of the issuing bank, card number, cardholder name, card expiration date, payment system, card validation code (CVV2 / CVC2), and photos of both sides of the bank card.

Data in KYC (Know your customer) includes identity document information, including copies of recent dated Utility Bills, Identity Card, Passport, and/or Driver's License.

Economic Profile Data includes details on annual income, net profit, expected annual amount of investment, sources of funds.

Location Data includes details on your actual location when interacting with our Website (for example, a set of parameters that determine regional settings of your interface, namely residency country, time zone, and the interface language)

Aggregated Data includes statistical or demographic data for any purpose. Such data can be derived from your data but may not be considered personal data in law as it will not directly or indirectly reveal your identity. An example of such Aggregated Data could be that we aggregate your Usage Data to calculate the percentage of users accessing a specific website feature and/or services/product preference.

Notwithstanding the above, if COMPANY combines Aggregate Data with data in a way that the end result can in any way identify the data subject, COMPANY shall treat such combined data as data which will be treated as per the provisions herein contained.

Processing of your data is carried out by COMPANY following the principles of lawfulness, fairness, transparency, and always adhering to the intended purpose of data processing, the principle of data minimization, accuracy, limited data storage, data integrity, confidentiality and accountability.

In general COMPANY collects and process the Personal Data, for any of the following reasons:

To perform its contract with you,

To comply with its legal obligations including without limitation to applicable anti-money laundering and terrorist financing laws and regulations (hereby referred to as Money-Laundering Law), and/or

To safeguard its legitimate interest

The Client acknowledges that all or part of the data concerning the Client's account and related transactions will be stored by the COMPANY and may be used by the Company in case of dispute between the Client and the Company.

The Client is responsible for updating any data provided to us in case of any change. Although we will strive to keep your data up to date and review and inspect any information provided by you, we may not be able to always do so without your help. The Client acknowledges that COMPANY holds neither commitment nor responsibility to the Client due to any aforesaid review or inspection of information.

### 3. HOW IS YOUR PERSONAL DATA COLLECTED?

We use different methods to collect data from and about you including through:

Direct Interactions. You will provide to us your Identity, Contact and Financial Data online through the Website and/or by filling in online forms and/or by corresponding with us by emails or otherwise. Data may be submitted to us by you when you wish to:

1. Register for a Trading Account;
2. Register for a Demo Account;
3. Subscribe to our publications and ongoing updates;
4. Request marketing and promotions to be sent to you;
5. Enter a competition, promotion or survey; and/or
6. Give us feedback or contact us.

We require to collect the above data in order that we are able to (i) provide our services efficiently, (ii) to comply with our ongoing legal and regulatory obligations, including, inter alia, (a) to prevent fraud and money laundering acts and/or (b) conduct the assessment of suitability and appropriateness test.

If you fail to provide the data when requested we may not be able to perform the contract we have or trying to enter into with you (for example, to provide you with our services). In this case, we may have to cancel a service you have with us but we will notify you if this is the case

at the time. It is important that the data we hold about you is accurate and current. Please keep us informed if your data changes during your relationship with us.

**Automated Technologies or Interactions.** When using our services, your device automatically transmits to us its technical characteristics. Locale (a set of parameters that determine regional settings of your interface, namely, residence country, time zone and the interface language) is used for the purpose of providing you with the best possible service within our platform. Using the information about IP address, cookies files, information about browser and operating system used, the date and time of access to the site, and the requested pages addresses allows us to provide you with the optimal operation on our web application, mobile and/or desktop versions of our application and monitor your behaviour for the purpose of improving the efficiency and usability of our Services. We use web analytics tools to track performance of our website and marketing source of user by cookies in order to optimize our marketing costs and provide users with better experience. You may at any time request that we refrain from any such transmissions (to the degree this is possible and subject to any of our legal obligations) by sending your request to the DPO using our details in the OUR CONTACT DETAILS below. We will address your request within 30 business days.

#### About Cookies.

A cookie is a small amount of data that often includes a unique identifier that is sent to your computer or device browser from a website's computer and is stored on your device's hard drive for tracking site usage. A website may send its own cookie to your browser if your browser's preferences allow it, but, to protect your privacy, your browser only permits a website to access the cookies it has already sent to you, not the cookies sent to you by other websites. Many websites do this whenever a user visits their website in order to track online traffic flows. When you visit our Website, our system automatically collects information about your visit, such as your Technical Data, including inter alia to, your browser type, your IP address and the referring website.

Cookies stored may determine the path the Client took on our site and used to anonymously identify repeat users of the website and what pages were most popular for Clients. However, the Company protects the Client's privacy by not storing the Client's names, personal details, emails, etc. Using cookies is an industry standard and is currently used by most major websites. Stored cookies allow the Website to be more user-friendly and efficient for Clients by allowing COMPANY to learn what information is more valued by Clients versus what isn't. You can set your browser not to save any cookies of this website and you may also delete cookies automatically or manually. However, please note that by doing so you may not be able to use all the provided functions of our website in full.

Please see our cookies policy for further details.

#### 4. PURPOSE FOR WHICH WE WILL USE YOUR DATA AND ON WHAT LEGAL BASIS

We process the aforementioned data in compliance with the applicable legislation as amended from time to time in order to (i) be able to perform our contractual obligations towards the Client and offer them the best possible service, (ii) provide our Services efficiently, (iii) comply with our legal and regulatory obligations, including, inter alia, (a) to prevent fraud and money laundering acts and/ or (b) conduct the assessment of suitability and appropriateness test, and (iv) protect our legitimate interests and your vital interests.

We process all data based on the following legal basis:

For compliance with our legal and regulatory obligations;

For the performance of our contractual obligations towards the Client;

For the purposes of safeguarding our legitimate interests and your interests and fundamental rights do not override those interests; and/or

On the basis of your consent.

Indicatively we set out below, a description of all the ways we plan to use your data and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate. Note that we may process the data for more than one lawful ground depending on the specific purpose for which we are using your data.

If you are an existing Client of the Website where we have a legitimate interest in communicating with you, or if you have given us your consent we will collect and process your personal data to communicate with you in case of support and/or sending newsletters, push-messages and calls to keep you in touch with our new features, news and events and the efficient provision of the full scope of our services.

Our Website is not intended for children and we do not knowingly collect data relating to children. As we do not allow users under the age of 18 to use our services, we need to obtain your birth date in order to confirm the Clients' age checks.

#### 5. OPTING OUT

If you do not want to receive any marketing newsletters or transmit your data you may also send to the Company, at any time, an email to [support@stocksfindex.com](mailto:support@stocksfindex.com) asking the Company to cease from sending such advertising content or sending your data to the third-parties for marketing purposes. The aforesaid mark removal and/or e-mail received by COMPANY will oblige us to cease sending advertisement content to you within 7 (seven) business days.

## 6. DISCLOSURE OF DATA

We may share your data with the parties set out below for the purposes set out above.

We require all COMPANY Group companies and any third parties processing data on our behalf to respect your data and to treat it in accordance with the provisions of the General Data Protection Regulation and applicable local legislation as amended from time to time. We take all reasonable steps so that our third-party service providers do not use your personal data for their own purposes and only permit them to process your data for specific purposes and in accordance with our instructions.

We note that these may change from time to time and we will do our best to update the relevant sections in due course.

In addition, a transfer of your data to another legal entity may occur as part of a transfer of our business or parts thereof in form of a reorganization, sale of assets, consolidation, merger or similar.

With regard to the transfer of data to recipients outside the COMPANY group, we note that we strive to maintain discretion with respect to client related matters and assessments of which we acquire knowledge. We may disclose data that concerns you only if (i) we are legally required to do so; (ii) if required when you expressly order us to process a transaction or any other service and (iii) it is required for the provision of our services under our contractual relationship and/or (iv) protection of our legitimate interests and applicable legislation as amended from time to time.

**External Third Parties.** Your data is shared with third party organisations/entities including but not limited to:

**A. Service Providers.** We may share your data with our trusted third party service providers, who, on our behalf, operate, maintain, and/or support our IT systems and IT infrastructure, our websites, manage our payment solutions, perform statistical analysis, marketing and advertising purposes, sending newsletters, provide customer support and perform other important services for us.

**B. Other COMPANY Affiliates.** We may also disclose your data to other COMPANY Affiliate companies in order for them to provide us with the relevant services.

**C. Regulator and state authorities.** The Client's details that are provided and/or that will be provided by the Client during his/her activity on the site may be disclosed by the Company to official authorities. The Company will make such disclosure only if required to be disclosed by the Company by applicable law, regulation or court order and to the minimum required extent.

Within the context of the control, monitoring and evaluation of the legality of the licensed investment activity of our Company by the state regulator, there are mandatory requirements requiring the transfer of data of users processed by the controlled entity.

**D. Other disclosures.** In addition to where you have consented to a disclosure of the data or where disclosure is necessary to achieve the purpose(s) for which, it was collected, data may also be disclosed in special situations, where we have reason to believe that doing so is necessary to identify, contact or bring legal action against anyone damaging, injuring, or interfering (intentionally or unintentionally) with our rights or property, users, or anyone else who could be harmed by such activities, or otherwise where necessary for the establishment, exercise or defence of legal claims.

## 7. DATA RETENTION

We store your data for as long as reasonably necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, tax, accounting or reporting requirements. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for your data, we consider the amount, nature and sensitivity of the data, the potential risk of harm from unauthorised use or disclosure of your data, the purposes for which we process your data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting and other requirements.

By law we have to keep your data (including call recordings) during our contractual relationship and for a minimum period of 5 (five) years from the date of termination of the Platform/Service used by the Client. The data storage period may be extended from 5 years to 7 years upon the request of the competent authority (regulator of the Company's licensed activities).

In general, all other data is stored for a period of 30 (thirty) business days after the date of termination of the provision of our services unless there is any other legal or regulatory reason to keep it.

At the expiration of the data retention period the data is erased by irreversible destruction and we also inform all third parties, to whom the data was transferred, regarding such erasure and request implementation of similar actions on their part.



## 8. YOUR RIGHTS AND HOW TO WITHDRAW CONSENTS AND UNSUBSCRIBE

We ask you to provide us with true, accurate and updated information on your identity and not misrepresent yourself to be another individual or legal entity. Any changes in your identifying details shall be notified to the Company immediately and in any case no later than the 7th day from the date of such changes. If your data is incorrect or incomplete, please contact our support services at the contact details listed in the section OUR CONTACT DETAILS below in order to change your data.

Under certain circumstances, you have rights in accordance with applicable legislation and our policies as amended from time to time. Some of the rights are rather complex and include exemptions, thus we strongly advise you to contact us (at the contact details listed in the section OUR CONTACT DETAILS below) and/or seek guidance from the regulatory authorities for a full explanation of these rights. You can find a summary of your rights below in this section.

**A. The right to access.** You have a right to obtain the confirmation as to whether or not your data are being processed by us. In addition, you have a right to obtain more detailed information about the data kept and the processing undertaken by us and under certain circumstances the right to receive a copy of this data.

**B. The right to rectification.** You have the right to have inaccurate data about you rectified, and, taking into account the purpose of the processing, to have incomplete data completed.

**C. The right to erasure.** This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. Please note however that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request. In case if you want to obtain complete erasure of your data (to apply the “right to be forgotten”), please note that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.

**D. The right to restriction of processing.** You have the right to request the restriction of processing of your personal data (a) if it is not accurate;(b) where processing may be unlawful but you do not want us to erase your data; (c) where you need us to hold the data even if we no longer require it; or (d) where you may have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

**E. The right to data portability.** To the extent the legal basis for the processing is your consent, and such processing is carried out by automated means, you have the right to receive your data in a structured, commonly used and machine-readable format. However, this right does not

apply where it would adversely affect the rights and freedoms of others and/or in case it may be technically impossible to do so.

**F. The right to object.** Subject to the legal basis on which the processing activity is based, you may object to processing of your personal data. Please note that in some cases, we may have compelling legitimate grounds to process your information which we need to comply with.

**G. The right to withdraw consent.** To the extent that the legal basis for the processing is your consent, you have the right to withdraw from that consent at any time. This may apply to marketing purposes and/or with regards to the transfer of your data to third parties. In case you withdraw from a consent given, then we will cease to process your data, unless and to the extent the continued processing is permitted or required according to the applicable data regulation or other applicable laws and regulations. The withdrawal from your consent will in no event effect the lawfulness of processing based on consent before its withdrawal.

**H. The right to complaint to data protection supervisory authority.** We do our best to ensure that we protect your data, keep you informed about how we process your data and comply with the applicable data protection regulation. In case you are not satisfied with the processing and protection of your data or the information you have received from us, then we urge you to inform us in order for us to improve. Please also do not hesitate to contact us, if you want to make use of your rights.

If you want to exercise any of your rights mentioned above and/or obtain more information regarding your rights and/or our policies and procedures please contact us through the points of contact listed in the Section OUR CONTACT DETAILS below. Please also provide us with relevant information to take care of your request, including your full name and email address so that we can identify you. We will respond to your request without undue delay.

We may need to request specific information from you to help us confirm your identity and ensure your right to access your data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you further information in relation to your request to speed up our response.

We try to response to all legitimate requests within one month. Occasionally it could take longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

## 9. DATA SECURITY

We have put in place appropriate security measures to prevent your data from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we

limit access to your data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your data on our instructions and they are subject to a duty of confidentiality.

We have put in place procedures to deal with any suspected data breach and will notify you and the competent regulator of a breach where we are legally required to do so.

Your help is always valuable in ensuring that your data is kept safe. Upon registration to the Website (or its mobile version), the Client will be asked to choose a username and password to be used by the Client on each future login and for the performance of transactions and use of the Company's Services. In order to protect the Client's privacy and operation with the Website sharing registration details (including without limitation, username and password) by the Client with other persons or business entities is strictly prohibited. The Company shall not be held responsible for any damage or loss caused to the Client due to improper use (including prohibited and unprotected use) or storage of such username and password, including any such use made by a third party, and whether or not known to or authorized by the Client.

Any use of the Website with the Client's username and password is Client's sole responsibility. The Company shall not be held responsible for any such use, including for validation that Client is actually operating in his/her account.

The Client is obliged to forthwith notify the Company's client service of any suspicion for unauthorized use of the Client's account. You may contact us at any time through the points of contact listed in the Section OUR CONTACT DETAILS below.

**Encryption of your data in transit.** Encryption provides a high level of security and privacy for your data. When you enter your data in our platform we use strong encryption technologies (such as Transport Layer Security) to protect your data during transmission from your devices to our servers.

For providing more trust and security we use digital EV (Extended Validation) Certificates issued by trusted Certificate Authorities. You can see the 'Green Bar' in the supported browser versions which confirms what all transmitted data is secure.

**Protection of your data in our infrastructure.** We make it a priority to develop services that are secure "by default". The "default" security of our services means that every new services and features are designed with strict security requirements in mind before we even begin development. This is the key to guaranteed protection and privacy of all data that our services handle and store, once the service or new feature is released.

For secure your data we use the pseudonymisation which allows most of our services to operate without using your actual data. Instead of that, our services use a system ID that can't be traced back to identify you.

The Company is always vigilant about the security of your data stored in our infrastructure. Because of that we locate all our equipment which used for your data processing in secure data centres. Network access to this equipment is isolated from the Internet. We use network segmentation for isolation of services which need different level of security from each other. In addition, we restrict logical access to your data for our employees on "need to know" basis. So, only personnel, who really requires access to your data for the purpose of providing you with our best service, will have access to it.

**Threats protection.** Our Company is highly knowledgeable about modern threats to data security and privacy, and we are well prepared to combat them. All events that occur in our infrastructure are continuously monitored, analysed and responded, which allows us to ensure proper protection of your data, keeping it safe from threats, vulnerabilities, and the effects of malware.

In the event of a failure that affects the accessibility of your data, we have data backup and recovery procedures in place that will us help to restore your data in short time. For guarantee the quick recovery we use high availability mode enabled for most critical databases which allows us to minimize downtime.

**Employee awareness of data security.** Our employees may handle your data in order to provide you with the first-class service. To guarantee the security and confidentiality of your data, we monitor all employees' actions with access to your data in our systems and grant access strictly on a "need to know" basis: only employees who need access will receive it. We hold regular training sessions to make sure that each employee understands the principles that the Company follows to achieve robust data security and privacy.

**If you choose not to give your personal information.** In the context of our business relationship we may need to collect data by law, or under the terms of a contract we have with you. Without this data, we are, in principle, not in a position to close or execute a contract with you.

If you choose not to give us this data, it may delay or prevent us from meeting our obligations. It may also mean that we cannot perform services needed to run your accounts or policies.

**To what extent we carry automated decision-making and profiling.** In establishing and carrying out a business relationship, we generally do not use automated decision-making. If we use this procedure in individual cases, we will inform you of this separately. In some cases, we may proceed with profiling in order to evaluate certain personal aspects. We shall inform you accordingly in case we perform any profiling. In general, any data collection that is optional would be made clear at the point of collection.

## 10. OUR CONTACT DETAILS

Who is responsible for the data processing and who you can contact.

The entity responsible for your data processing is IQ labs LTD and you can contact us using the details set out below:

support@stockskfinex.com

If you have any questions, or want more details about how we use your data, you may contact us at the above contact details and we will be happy to provide you with further details.

## 11. LINKS TO OTHER WEBSITES

We may provide links to third party websites in our Website. These linked websites are not under our control, and we therefore cannot accept responsibility or liability for the conduct of third parties linked to our websites, including without limitation to the collection or disclosure of your data. Before disclosing your data on any other website, we encourage you to examine the terms and conditions of using that website and its privacy policies.

## 12. CHANGES TO THIS PRIVACY POLICY

1. We reserve the right, at our discretion, to add, modify or remove portions of this Privacy Policy in the future to ensure that the information herein provides relevant and adequate information about our collecting and processing of your data.
2. This privacy policy may be supplemented by other information received from the COMPANY group and other terms and conditions applicable to the Website or which you have agreed to as part of your interaction with us.
3. We will inform you about any updates to this privacy policy through e-mail, a notice through your Trading Account, the Website and/or any other communication method you have provided to us. Your comments and feedback are always welcome. You may contact us at any time through the points of contact listed in the Section OUR CONTACT DETAILS above.

## APPENDIX A

1. In relation to a company, that company, any subsidiary or subsidiary undertaking or any holding company or holding undertaking or any connected company from time to time of that company.

2. An undertaking is a parent undertaking in relation to another undertaking, a subsidiary undertaking, if a. it holds a majority of the voting rights in the undertaking, or b. it is a member of the undertaking and has the right to appoint or remove a majority of its board of directors, or c. it has the right to exercise a dominant influence over the undertaking— d. by virtue of provisions contained in the undertaking's articles, or e. by virtue of a control contract, or f. it is a member of the undertaking and controls alone, pursuant to an agreement with other shareholders or members, a majority of the voting rights in the undertaking.
3. For the purposes of the above an undertaking shall be treated as a member of another undertaking— a. if any of its subsidiary undertakings is a member of that undertaking, or b. if any shares in that other undertaking are held by a person acting on behalf of the undertaking or any of its subsidiary undertakings.
4. A parent undertaking shall be treated as the parent undertaking of undertakings in relation to which any of its subsidiary undertakings are, or are to be treated as, parent undertakings; and references to its subsidiary undertakings shall be construed accordingly.
5. A company is connected with another company if: a. the same person has direct or indirect control of both companies, b. a person (“A”) has control of one company and persons connected with A have control of the other company, c. A has control of one company and A together with persons connected with A have control of the other company, or d. a group of two or more persons has control of both companies and the groups either consist of the same persons or could be so regarded if (in one or more cases) a member of either group were replaced by a person with whom the member is connected.