



PRIVACY POLICY

infinox.com

Contents

1.	Introduction	03
2.	Collection of and Use of Personal Information	03
3.	Our Affiliates and Partners	03
4.	Using Your Information to Help in the Prevention of and Including Terrorism and Crime	04
5.	Third Parties and Transfers of Personal Data	04
6.	Security	04
7.	Restriction of Responsibility	04
8.	Marketing	05
9.	Training of Staff	05
10.	Recording Telephone Calls	05
11.	Clients Rights	05
12.	Changes to This Privacy Statement	05

1. Introduction

Infinox Global Limited (“INFINOX”) (“the Company”) and all persons responsible for using data are subject to strict rules relating to the collecting, processing, and use of personal information. Client personal data is governed by the Anguilla Data Protection Act. INFINOX endeavors to ensure personal information and data is protected against unlawful or unauthorized use including loss or damage. Hence the policy extends to enhancing cybersecurity by implementing adequate processes and controls and regular assessment thereof to monitor appropriateness and adequacy. Data collected is:

- used fairly and lawfully
- used for limited, specifically stated purposes
- used in a way that is adequate, relevant and not excessive
- accurate
- kept for no longer than is absolutely necessary
- handled according to people’s data protection rights
- kept safe and secure
- not transferred without adequate protection

The Company is the data controller in respect of the information it gathers from its clients including that obtained via email communication. The Company views the protection, privacy, and the safeguarding of that personal and financial information of clients as a high priority.

This statement outlines the Company’s privacy policy and explains how the Company ensures all personal information collected by it remains confidential and how it respects the privacy of individuals and always safeguards it. By opening an account, clients give their consent to the collection and use of personal information by the Company as explained in this privacy statement.

2. Collection of and Use of Personal Information

The Company obtains details from each client to verify their identity and assess appropriateness for opening a trading account. Information collected includes personal names, physical and email addresses, telephone numbers, dates of birth, occupation, passport and other identification details, and personal financial information including annual income and approximate net worth to assess a client’s financial positions. In addition, the Company may collect other information to better assess a client’s particular interests, e.g. for general marketing purposes.

3. Our Affiliates and Partners

The Company may at times enter partnerships and alliances which may include joint marketing and affiliate agreements with other companies who offer products and services that might be of value to the Company’s clients. The Company may share information with such partners and affiliates if the information is required to provide the product or service a client has requested; or to provide a client the opportunity to participate in the products or services the partner or affiliates offer; and to ensure that such products and services meet a client’s needs and are delivered in a manner that is useful and relevant. The use of a client’s personal information is limited to the purposes identified in the Company’s relationship with the partner or affiliate.

4. Using Your Information to Help in the Prevention of and Including Terrorism and Crime

Where we are required by law, your personal information may also be disclosed to an applicable governmental, regulatory or enforcement authority. These authorities may then use your personal information to investigate and act on any breach of law or regulatory rules in accordance with their procedures.

5. Third Parties and Transfers of Personal Data

The Company does not sell, license, lease or otherwise disclose any client's personal information to any third party for any reason, except in the following circumstances:

- where required by regulatory, law enforcement or other government authorities;
- when necessary to protect the Company's rights or property;
- to help improve services to clients where the Company may engage another business to help carry out some internal functions such as account processing, order fulfilment, customer service, client satisfaction surveys or other support services or data collection activities relevant to the Company's business.

Information may be processed by staff who work for the Company or for one of the Company's suppliers. The Company may also provide a party with client information from a Company database to help analyse and identify client needs and notify clients of product and service offerings. Use of the information shared is strictly limited to the performance of the task of the Company's requests and for no other purpose.

All third parties with whom the Company shares personal information are required to protect personal information in compliance with the methods and processes assumed by Infinox Global limited.

6. Security

All information that clients provide to the Company is stored on secure servers. Payment transactions are encrypted using SSL technology. Where the Company has given, or where a client has chosen, a password to access certain parts of the trading platform, the client is responsible for keeping the password confidential and clients should not share the password with anyone.

The transmission of information via the Internet can never be completely secure. Although the Company does its best to protect personal data it cannot guarantee the security of data through email communication and any transmission is at a client's own risk. Once it has received client information the Company will use strict procedures and security features to try to prevent unauthorised access.

7. Restriction of Responsibility

If at any time any client chooses to purchase a product or service offered by another company, any personal information the client shares with that company will no longer be controlled under this Company's privacy policy. The Company is not responsible for the privacy policies or the content on any other sites and has no control over the use or protection of information provided by clients or collected by those sites. Whenever a client elects to link to a co-branded platform, the client may be asked to provide registration or other information and such information will be going to a third party and the client should therefore first become familiar with the privacy policy of that third party.

8. Marketing

The Company may use client data to provide information about products and services which could be of interest and Company staff or agents may contact a client about them by email, telephone, and post. To prevent information being used in this manner, clients should tick the relevant boxes when being asked for their marketing preferences. These set preferences can be changed at any time by contacting the Company. An opt-out election made by one account owner of a joint account is applicable to all account owners of the joint account. An opt-out election must be made for each separate account a client holds with the Company.

9. Training of Staff

The Company provides regular training to our staff on their privacy obligations. We regard data protection breaches very seriously and will enforce appropriate action whether the breach is deliberate or through negligence.

10. Recording Telephone Calls

The Company may monitor or record phone calls with you in case we need to check we have carried out your instructions correctly, to resolve any queries or issues, for regulatory purposes and to help improve our quality of service and to help detect or prevent fraud or other crimes. Conversations may also be monitored for staff training purposes.

11. Clients Rights

A client has the right to request a copy of all the information the Company holds of them. A fee might be charged for providing this. A client also has the right to have any inaccuracies corrected, the right to object to the use of their data, and the right to block any specific uses of their data by the Company by means of a request in writing to the customer service team at support@infinox.com

12. Changes to This Privacy Statement

The Company may from time-to-time revise and update this Privacy Statement and will promptly share the new version by email to inform all clients of the change. The client agrees to accept the email of a revised Privacy Statement as actual notice to them. Any dispute over the Company's Privacy Statement is subject to this notice and the Company's Terms and Conditions. The Company encourages clients to periodically review this privacy statement so that they are aware of the information the Company collects, how it uses it and to whom else it might be disclosed. If a client has any questions that this Privacy Statement does not address, they should contact a Customer Services representative of the Company.