



IFC IFC Investments
Cyprus Ltd

Registered office: 242 Arch.Makariou III
P. LORDOS CENTRE, BLOCK A, 2nd floor, Office 203
3105, Limassol, Cyprus
Tel: +357 25340396, Fax: +357 25340310, email: info@if-center.com
www.if-center.com

Privacy and Cookies Policy

IFC INVESTMENTS LIMITED is a Company regulated by the Cyprus Securities and Exchange Commission, CySEC, (www.cysec.gov.cy), under the license number 327/16. The Offices of IFC INVESTMENTS LIMITED are located at Arch.Makariou III, 242 P.LORDOS CENTRE, BLOCK A, 2nd floor, Flat/Office 203, 3105, Limassol, Cyprus (hereinafter: “We”, “Us”, the “Company”)

To help us to understand the needs of our customers and improve our service, data collected on our website at www.if-center.com will be held on our secure database. All customer data stored on our servers are stored in compliance with statutory requirements. We will never make this data available to any other company or third party.

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.

If you are a natural person, we are the personal data controller of your personal data in relation to the processing activities which your personal data undergo as stated further below.

Collection of information

If you are decide to apply to open an account with us and hence become our Client there is certain information that we will require from you in order to do so or require from you from time to time. Certain information is required in order to enter into an agreement with us. Certain information is also required in order to satisfy statutory requirements and may also be required in order to further our legitimate interests. We may also require your consent for the processing of any information in which case we will request you to provide such consent to us.

We may collect Your Information directly from you (in your completed Account Opening Application Form or other way) before you become our Client 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 such as information about your income, wealth, assets and personal investment preferences and targets.

We may also collect Your Information in regards 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 our Service to you (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.



Use of the Information

Security

We endeavour to protect the information you provide and ensure that your privacy is protected and there are strict security procedures that have been put in place. Our servers can only ever be accessed by authorised personnel.

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.

Your consent

By using our website and allowing cookies on your browser which gives us access to certain information or manually submitting your information to us you consent to the use of that information as set out in this policy. If we change our privacy policy we will post the changes on this page, and may place notices on other pages of the website, so that you may be aware of the information we collect and how we use it at all times. Continued use of the service will signify that you agree to any such changes.

Information Collection

When you access our website we collect non-identifiable information in the following ways:
When you access our website we collect information that your browser sends whenever you visit a website or online service (“**Log Data**”). This Log Data may include, but is not limited to, your computer’s Internet Protocol address, browser type, the web page you were visiting before you came to the Site and information you search for on the Site and the Service. In addition, if you access the Service via a mobile device, we may collect a PushID, subject to your consent as indicated by you in the mobile application, and a Mobile IP.

Cookies

Cookies are small text files stored by your browser on your computer or device when you visit certain pages or perform certain actions on this and other websites. They are used to help your browser remember your choices and display the correct information for you - such as items in your basket - and not treat you as a new visitor each time you visit a page.

Some cookies are only set for the duration of your visit (“session cookies”) to help you get around and give you relevant information. Others are set for longer periods (“persistent cookies”) so that your browser can remember your choices from a previous visit. The cookies stored cannot harm your device, are anonymous, and unique to your browser.

You can choose to disable or block these cookies in your browser but without some of them our site will not work. For more detailed information about cookies please visit www.allaboutcookies.org.



How we use cookies?

We use cookies to help us find which services you are interested in and remember details about your application. We don't store sensitive information like your name or address in our cookies, just an anonymous reference to them so that we're able to find them.

We also occasionally set cookies to help you navigate around the site, enhance your experience, or give you important information regarding interests.

In order to give you the best possible client experience, we partner with a number of Third parties to help us collect anonymous statistics about how our site is being used and provide you with further information that may be of interest to you. As part of this process our Third party partners may set their own cookies during your visit.

Cookies Settings

If you don't want to receive certain categories of cookies on our website, you can opt-out of them. We will need to set a cookie so that we can remember your choices when you next visit the website from the same browser. At the present time it is not technically possible for us to allow you to carry your settings with you between your browsers and devices so you will need to change these settings from each browser you use.

Please also be aware that we make every effort to respect your choices, however, there is the possibility that not all cookies will be captured. If this is a concern then we would recommend that you change your cookie settings via your browser; your browser help function will tell you how.

Note: most of our website may work without cookies, but you will lose some features and functionality if you choose to disable cookies.

We use Google Analytics on the website, a web analytics service provided by Google, Inc. ("Google"). Google Analytics is used to help us obtain data regarding use of the website. The information generated by the cookie about your use of the website (including your IP address) may be transmitted to and stored by Google on servers in the United States. Google will use this information for evaluating your use of the website, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full website functionality. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

How We Use Information



IFC IFC Investments
Cyprus Ltd

Registered office: 242 Arch. Makariou III
P. LORDOS CENTRE, BLOCK A, 2nd floor, Office 203
3105, Limassol, Cyprus
Tel: +357 25340396, Fax: +357 25340310, email: info@if-center.com
www.if-center.com

We use your information in order to (i) monitor and analyze use of the website and for the technical administration of the website, (ii) improve the website, (iii) generate and derive useful data and information concerning the interests, characteristics, use and behavior of our visitors.

Aggregate Information and Non-Identifying Information. We may share aggregated information, including queries and offers generated as a result of your use of the website, that includes non-identifying information and Log Data, with third parties for industry analysis, demographic profiling, other commercial purposes and to deliver targeted advertising about products and services. Any aggregated information shared in these contexts will not contain any personal information.

Compliance with Laws and Law Enforcement. We cooperate with government and law enforcement officials and private parties to enforce and comply with the law.

Business Transfers. We may sell, transfer or otherwise share some or all of our assets, including among others your Personal Information and Log Data, in connection with a merger, acquisition, reorganization or sale of all or substantially all of our shares or assets, or in the event of our bankruptcy.

In addition, we may post additional ancillary privacy notices with respect to specific services.

If you are our client or you apply to become our client, 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 that 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. We may transfer your personal information outside the European Economic Area. If we will make such a transfer, we will ensure that the transfer is lawful and that there are appropriate security arrangements in place to safeguard your personal data as provided by Applicable Regulations.

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) such an extent as reasonably required so as 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 under the Regulation (EU) No 648/2012 of the European Parliament and of the Council of 4 July 2012 on OTC derivatives, central counterparties (CCPs) and trade repositories (TRs) (EMIR);
- (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 that provide telephone or email surveys with the purpose to improve our Services or activities, but only your contact details;
- (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 so as to exercise their duties to further the Agreement between us.

(o) To our successors or assignees or transferees or buyers as stated in the Client Agreement.

(p) to the Inland Revenue in Cyprus, in relation to US taxpayers which will in turn report this information to the IRS of the US according to the Foreign Account Tax Compliance Act (FATCA) of the USA and the relevant intergovernmental agreement between Cyprus and the US

Where you are a natural person and our use of your personal information requires your consent, we will request you to provide your consent freely, specifically, after being informed and unambiguously by a statement or by a clear affirmative action, signifying your agreement to the processing of personal data relating to you.

We will require you to provide your consent in an intelligible and easily accessible form, using clear and plain language In such a case, we will maintain records of you having provided your consent.

If we rely on your consent as our legal basis for processing any of your personal information, you have the right to withdraw that consent at any time by contacting us using the contact details set out in this privacy policy. The withdrawal of consent shall not affect the lawfulness of processing based on consent before its withdrawal.

Duration of keeping 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 taking into account the type of information that is collected and the purpose for which it is collected, our statutory obligations to maintain information, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused and no longer required information at the earliest reasonable time.

Your rights as a natural person

You have the right to request from us access to and rectification or erasure of your personal data or restriction of processing concerning you or to object to processing as well as the right to data portability of your personal data as provided by Applicable Regulations.

You also have the right to file a complaint with the Data Protection Commissioner.

Scope of the Policy and Third Party Sites

This policy applies only to us and this website. We do not exercise control over other websites, or over banners or links from within our website. These other websites, banners or links may place their own cookies or other files on your computer, collect data or solicit personal information from you subject



IFC IFC Investments
Cyprus Ltd

Registered office: 242 Arch.Makariou III
P. LORDOS CENTRE, BLOCK A, 2nd floor, Office 203
3105, Limassol, Cyprus
Tel: +357 25340396, Fax: +357 25340310, email: info@if-center.com
www.if-center.com

to such third party's privacy policy. We encourage you to read the privacy policies and other terms of such third parties before accessing or using them.

How to contact us

We welcome your views about our website and our privacy policy. If you would like to contact us with any queries or comments please send an e-mail to info@if-center.com