



## **Privacy and Cookie Policy**

### **Who we are**

FX Back Office provides a CRM, Partnership and Client Area solution for companies who directly request such a solution for their business.

FX Back Office LTD is responsible solely for this website: [www.fxbackoffice.com](http://www.fxbackoffice.com), and whether you browse as a guest or register with us, we will collect different types of information about you in order to communicate with you regarding our services, once you have willingly requested information.

We are not responsible for the content or privacy and/or cookie practices of external sites, third party Apps or your chosen internet browser. However, we do seek herein to explain how we work with third parties, including search engines such as Google. You can see Google's Privacy Policy [here](#).

### **The information we collect**

The information that we gather falls broadly into two types (please see further below for how we collect it and what we use it for):

1.1 Information that relates directly to you (e.g. your name and contact details, plus your communication preferences).

1.2 Information that does not directly identify you (e.g. which country you are browsing our site from), specifically:

(1) Your IP address through the placement of cookies; and

(2) Location data, which might be gained through your IP address or GPS data

### **How we use that information**

2.1 We use certain information when we seek your permission. The majority of the time, we will be using your information in accordance with your specific consent or instructions: for example, when you have requested or consented to receiving certain information by contacting us directly via our form on the website, or entered into a contract with us for our services.

At other times, we will use your information on one of the other lawful bases described below:

2.2 Contract.

(1) When you enter into a contract for our services, or where you wish to register an interest in doing so, we will use your personal data to enter into and fulfil our contractual relationship with you, or to provide you the information you have requested through your chosen form of communication.

(2) Fulfilling our contract with you means being able to manage and administer our services, provide you with customer care and consumer compliance. This might include processing payments, as well as improving your customer experience online and otherwise, including by monitoring our service levels via e-mail, telephone, skype or other forms of communication and responding to feedback.

(3) To keep you updated on our services.

(4) To contact you to let you know about our new product features, or other services that may compliment your business (which may in some cases be provided by third parties), including by email, mail, telephone, or SMS text message.

#### How we gather your information

3.1 Information (as set out in Section 1) is gathered in the following ways:

(1) indirectly (e.g. using website technology that tracks and administers your visits through your browser)

(2) directly (e.g. when you either request information from us, or enter into a contractual subscription with us)

#### How you can decide how we can contact you

4.1 We will contact you in accordance with your preferences once you sign up for information on our services via our online form.

4.2 We also provide the means for you to withhold your permission for us to contact you. We do this by using unsubscribe options through our marketing e mails, which allow you to un-subscribe from our mailing list at any time, and by providing you specific means to communicate you no longer want your information to be stored in our database or used in any way, as set out in point 5.1 herein.

4.3 We do however need your information to be able to contact you to provide the service you wish to use while under contractual obligations. In that case, by signing a contract for our services you are agreeing that we will have to send you service communications to run the service itself and provide you with support, and we will not be able to offer you the chance to opt-out from receiving those messages until you decide you no longer wish to use our services.

#### How to access and update your personal information

5.1 You can update your contact details and marketing preferences by emailing [data.protection@fxbackoffice.com](mailto:data.protection@fxbackoffice.com), calling us via our telephone number on the website, or by writing to us at Data Protection Department, 4 Prometheus Street, 1st floor, 1065, Nicosia. You can also contact us on the e-mail provided previously to withhold your permission for us contacting you again.

5.2 You have the right to access the personal information you have provided to us, or from any other organisation that controls your personal information. To obtain a copy of the personal information that you have willingly given us, please contact [data.protection@fxbackoffice.com](mailto:data.protection@fxbackoffice.com)

#### Cookies

6.1 A cookie is a small piece of information that is placed on your computer when you visit certain websites. When we refer to “cookies”, we include other technologies with similar purposes, such as tags and identifiers. Find out more about the use of cookies on <http://www.cookiecentral.com>.

6.2 When you first visit our sites using a new browser, or if you visit in private browsing mode, we will provide you with a cookies permission banner seeking your consent to use of cookies as required by law. By clicking OK or clicking through to any part of the site, we will start to manage your visit using cookies.

6.3 Your browser uses the following:

(1) Analytics cookies that anonymously remembers your computer or mobile device when you visit our website. We use that information for customer analytics, mainly to see where our user base comes from. Your browser may use similar cookies for similar purposes and to serve advertisements for others.

6.4 We have no access to third party cookies and third party organisations have no access to ours. The third party organisations that place cookies, including your browser (such as Google) and the third party companies who pay for advertising and analytics services using this information, will have their own privacy policies.

## 7. How to manage your cookies

7.1 You can go to your browser settings to manage your cookies from there. If you need help to do this or more information regarding this, please contact us on [data.protection@fxbackoffice.com](mailto:data.protection@fxbackoffice.com)

## 8. How we protect your information

8.1 We invest in high-quality security and do our utmost to protect user privacy both on and off our website. No data transmission over the Internet can be entirely secure, and therefore we cannot guarantee the security of your personal information and/or use of the website. Any information that you send is at your own risk and may be read by others. However, once we have received your personal information we use the strictest procedures to protect the security of the information provided to us.

## 9. Disclosing personal information

Your personal information can be disclosed when/ if/ or in case of using:

9.1 We sell our businesses. Should we proceed to sell or reconstitute any part of our business that holds your personal information, it will be necessary in some circumstances to share or transfer that information to the buyer or new entity: for example, so that they can continue to provide continuity of service to you. You will always be notified of such a change of control or ownership, and will be given the opportunity to object or opt out of any further communications from us or the buyer or new entity, except where such use of your personal information is necessary for a lawful purpose (such as a legal obligation or right, or where necessary to continue an existing contract with you)

9.2 Your internet browser or other accounts. Depending on which browser you use to visit our site, and in accordance with your browser cookie preferences (see above), your browser (such as Google) may collect information about you and your visit for its own services, including those services such as segmented or personalised advertising that it provides to other sites.

9.3 Legal requirements. We may disclose your personal information if we are required to do so by law, or if in good faith we believe such action is necessary to comply with the law or a legal obligation.

## 10. Where is your information stored?

10.1 The personal information that you willingly offer to us will be sent and stored inside the European Economic Area ("EEA"). You can find out further details about this by contacting us on [data.protection@fxbackoffice.com](mailto:data.protection@fxbackoffice.com)

10.2 We will only keep your personal information for as long as we need it for a lawful purpose: whether because of the products and services we have provided to you, for example if you have entered into a contractual obligation with us; or if you have requested information from us via our online form, and/or because we believe you still wish to hear from us.

## 11. Changes to this Privacy policy

11.1 If we change our Policy, we will immediately inform you of the changes via your chosen communication method.

## 12. If you believe we are not properly applying this Privacy Policy

12.1 You have the following rights:

- (1) To obtain access to, and copies of, the personal data that we hold about you, or require that it is transmitted to another data controller;
- (2) To request that we restrict our data processing activities or cease processing your personal data in certain ways, for example because you do not consider it lawful;
- (3) To require us not to send you marketing communications via the methods laid out herein;
- (4) To withdraw your consent, where we are relying on it to process your personal data;
- (5) To object to how we process your personal data, in particular where we are relying on our legitimate interests; and
- (6) To ask us to erase the personal data we hold about you, for example because it is causing you distress or you believe it to be no longer relevant, or to correct the information if it is incorrect.

## 13. If you don't feel we're adhering to this Policy, what should you do?

13.1 If you believe that we have not adhered to this Policy, please notify us by email at [data.protection@fxbackoffice.com](mailto:data.protection@fxbackoffice.com) and we will try to solve the problem promptly. If you are not satisfied with our response, you have every right to complain to a higher governing body within the European Union.

**This Policy was last updated on 24<sup>th</sup> of May, 2018.**