



First-Class Trading Leader CFD,  
Cryptocurrencies, FX and Indices

# PRIVACY POLICY

[support@lionsfx.com](mailto:support@lionsfx.com)

2017

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The 'Privacy Policy' is entered by and Alpinex Capital Ltd which operates LionsFX website and the Client.

Alpinex Capital Ltd is registered in Saint Vincent and the Grenadines under number 24151 IBC 2017, registered address: Suite 305, Griffith Corporate Centre, Beachmont, 1510 Kingstown, Saint Vincent & the Grenadines, , to its Clients of the terms of this Agreement shall be referred to as 'Company' or 'LionsFX' or 'We'.

## **1. INTRODUCTION**

This Policy applies to existing and potential clients as well as to any visitors of the Company's website(s).

The Company is committed to protecting the privacy of all personal data which it obtains from you, including information obtained during your visits on this website.

## **2. COLLECTION OF PERSONAL DATA**

The Company will only use your personal data in accordance with worldwide data protection practices. The Company will use, store, process and handle personal information of the Client.

Personal data collected includes but is not limited to:

- 2.1 Personal details such as name, address, telephone number and/or e-mail address;
- 2.2 Financial details such as estimated annual income and net worth, trading experience and investment knowledge;
- 2.3 Identity verification Documents such as passport and ID, utility bills, and/or bank statements or your company information certificate/details.
- 2.4 Credit/debit card details
- 2.5 If your personally identifiable information changes, you must inform us by emailing our Customer Support at [support@lionsfx.com](mailto:support@lionsfx.com).

Any information that does not enable identification, location, or contacting of an individual, such as aggregated information, is “Anonymous Information”, and LionsFX may process Anonymous Information in any way it so considers without prior notice to you.

## 3. USE OF PERSONAL DATA

The following list illustrates the reasons why the Company may need to use your personally identifiable information:

- To verify your identity
- To ensure that you meet the suitability requirements to use our products and services
- To manage the account you have with us
- To process your transaction
- To send you information about transactions/post-transactions services
- To keep you updated with news on our products, services and any other information relevant to your working relationship with the Company
- For website improvement purposes

### 3.1 Records

Under Applicable Regulations, the Company will keep records containing Client personal data, trading information, account opening documents, communications and anything else which relates to the Client for at least five (5) years, which is calculated after the execution of the transaction or the termination of the business relationship or in case of termination of our business relationship.

### 3.2 Recordings

Telephone conversations between the Client and the Company may be recorded and recordings will be the sole property of the Company. The Client accepts such recordings as conclusive evidence of the Orders/Instructions/Requests or conversations so recorded.

Any information that does not enable identification, location, or contacting of an individual, such as aggregated information, is “Anonymous Information”, and LionsFX may process Anonymous Information in any way it so considers without prior notice to you.

## **4. PRIVACY**

Any personal information you provide to the Company will be treated as confidential and shared only within the Company, its affiliates and its business partners and will not be disclosed to any third party except under any regulatory or legal proceedings as well as to third parties that solely provide statistical services to the Company to improve its marketing campaign. Web site tracking systems may also collect data detailing the pages you have accessed, how you discovered this site, the frequency of visits and so on. The information the Company obtains is used to improve the content of our web site and may be used by us to contact you, by any appropriate means, and to provide you with any information we believe may be useful to you. The personal information that you provide in connection with registering yourself as a user of the website(s) or of the Services is classified as Registration Information.

Registration Information 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. Your password must not be revealed to anyone. Registration Information is safely stored on secure servers that only authorized personnel have access to via password.

The Company encrypts all personal information as it is transferred to the Company and thus makes all necessary effort to prevent unauthorized parties from viewing any such information. Personal information provided to the Company that is not Registration Information also resides on secure servers and is again accessible only to authorized personnel via password. This information cannot be online accessible by you; therefore, no password shall be selected to view or modify this information.

## **5. CHOICE/OPT-OUT**

If you no longer wish to receive any promotional communications, you may opt-out of receiving them by following the instructions included in each communication.

You will be notified when your personal information is collected by any third party that is not our agent/service provider, so you can make an informed choice as to whether or not to share your information with that party.

## **6. COOKIES**

A cookie is a small text file that is stored on a user's computer for record-keeping purposes. The Company uses cookies on this website. The Company does link the information that it stores in cookies to any personally identifiable information you submit while on our website(s).

The Company uses both session ID cookies and persistent cookies. A session ID cookie does not expire when you close your browser. A persistent cookie remains on your hard drive for an extended period of time. You can remove persistent cookies by following directions provided in your Internet browser's "help" file.

The Company sets a persistent cookie for statistical purposes. Persistent cookies also enable the Company to track and target the location and the interests of our users and to enhance the experience of our services on our website(s).

Some of the Company's business partners use cookies on the Company's website(s). The Company has no access to, or control over these cookies.

## **7. DISCLOSURE OF PERSONAL DATA**

The Company reserves the right to disclose your personally identifiable information as required by law and when the Company believes that disclosure is necessary to protect our rights and/or to comply with a judicial proceeding, court order, or legal process served on our Web site. The Company will not be liable for misuse or loss of personal information resulting from cookies on the Company's website(s) that the Company does not have access to or control over. The Company will not be liable for unlawful or unauthorized use of your personal information due to misuse or misplacement of your passwords, negligent or malicious, however contacted.

## 8. CONFIDENTIALITY OBLIGATIONS

Client information which the Company holds is to be treated by the Company as confidential and will not be used for any purpose other than in connection with the provision, administration and improvement of the Services, for research and statistical purposes and for marketing purposes (if the Client's consent is obtained where he is a natural person) and as provided for under the paragraph below. Information already in the public domain, or already possessed by the Company without a duty of confidentiality will not be regarded as confidential.

The Client agrees that the Company has the right to disclose Client information (including recordings and documents of a confidential nature, card details, personal details) in the following circumstances:

- a. where required by law or a competent Court;
- b. where requested by any other regulatory authority having control or jurisdiction over the Company or the Client or their associates or in whose territory the Company has Clients;
- c. to relevant authorities to investigate or prevent fraud, money laundering or other illegal activity;
- d. to execution venues or any third party as necessary to carry out Client Instructions or Orders and for purposes ancillary to the provision of the Services;
- e. to credit reference and fraud prevention agencies, third authentication service providers and other financial institutions for credit checking, fraud prevention, anti-money laundering purposes, identification or due diligence checks of the Client. To do so they may check the details the Client supplied against any particulars on any database (public or otherwise) to which they have access. They may also use Client details in the future to assist other companies for verification purposes. A record of the search will be retained by the Company;
- f. to the Company's 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 the Company collect, storage, process and use Client information or get in touch with the Client or improve the provision of the Services under this Agreement;
- h. to data reporting service providers;

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- i. to other service providers for statistical purposes in order to improve the Company's marketing, in such a case the data will be provided in an aggregate form;
- j. to market research call centers that provide telephone or email surveys with the purpose to improve the services of the Company;
- k. where necessary in order for the Company to defend or exercise its legal rights;
- l. at the Client's request or with the Client's consent;
- m. to an Affiliate of the Company.

## 9. RIGHT OF ACCESS

In compliance with the Law, every user is granted a number of rights in relation to their Personal Data. These rights include accessing and/or amending your Personal Data, putting a stop to the processing on this data and preventing undesirable marketing.

Under the Law, you have (subject to certain exceptions) the right to request any personal data the Company holds about you and to inform the Company of any perceived inaccuracy. We may charge a fee to cover the associated administrative costs.

You are not obligated to provide any of the personal data requested by the Company. In the absence of this information, however, the Company may not be able to open an account for you, or to provide you with any other services, information or assistance you have sought.

## 10. CHANGES IN THIS PRIVACY STATEMENT

The Company reserves the right to make changes to this Privacy Policy from time to time for any reason and will notify you of such changes by posting an updated version of this Privacy Policy on this website. You are responsible for regularly reviewing this Privacy Policy and if you use this website after any such changes are published, such use shall constitute your agreement to such changes.



## **11. CONSENT**

By accessing this website, you consent to the Company collecting, maintaining, using and disclosing personal data about you and provided by you or by another person as in accordance with this Privacy Policy.

## **12. ENQUIRIES**

If you have any enquiries regarding this “Privacy Policy” please inform us by emailing our Customer Support at [support@lionsfx.com](mailto:support@lionsfx.com)