



GMO-Z.com Trade Limited

## Privacy Policy

Effective Date: 17<sup>th</sup> July2017

Version 1.0

# Privacy Policy

## Collection of Data

We will collect your personal data in order to provide financial services to you. We must collect certain personal information from all applicants to enable us to comply with our regulatory obligations. If you decline to provide certain information to us, we may not be able to continue with your application.

When you apply for a live or demo account we will ask you to provide information about your name, address, date of birth, employment details and other personal circumstances. We will obtain this information via standard application forms.

## Use of Data

Your data are also collected in the ordinary course of continuation of the business relationship between the Client and GMO-Z.com Trade Limited ("Z.com"), for example, when the Client effects transactions.

Z.com may use your data for the following purposes:

- processing the Client's applications for opening accounts, financial accommodation or credit facilities or other services or products;
- daily administering and operation of the accounts, services and facilities provided to Client;
- conducting client identification and verification procedures and credit checks at the time of application and from time to time during the continuation of the business relationship between the Client and Z.com whether at special or regular reviews;
- meeting the disclosure requirements under any law, regulations, guidelines, codes of practice or court orders binding on, or applicable to, Z.com or any of its group companies, including but not limited to disclosure requirements relating to prevention of money laundering, terrorist financing;
- complying with the obligations, requirements or arrangements for disclosing and using data that apply to Z.com or any of its group companies or that it is expected to comply according to:
  - a) any law binding or applying to it within or outside Saint Vincent and the Grenadines ("SVG") existing currently and in the future (e.g. laws related to automatic exchange of financial account information);
  - b) any guidelines, guidance or requests given or issued by any legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations of financial services providers within or outside SVG existing currently and in the future (e.g. guidelines, guidance or requests related to automatic

exchange of financial account information) and any international guidance, internal policies or procedures;

c) any present or future contractual or other commitment with local or foreign legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations of financial services providers (together the "Authorities" ) that is assumed by or imposed on Z.com or its group company by reason of its financial, commercial, business or other interests or activities in or related to the jurisdiction of the relevant local or foreign legal, regulatory, governmental, tax, law enforcement or other authority, or self-regulatory or industry bodies or associations;

d) any agreement or treaty between Authorities;

- assisting other financial institutions to conduct credit checks and collect debts;
- designing services and products for the Client's use;
- your name and contact details may be used for marketing Leveraged Foreign Exchange trading, Over-the-counter Gold Bullion/Silver trading, CFDs, Binary Options or any other financial or related services and products of Z.com and/or its group companies;
- ensuring ongoing credit worthiness of the Client;
- determining amounts owed to or by the Client from time to time;
- collecting amounts outstanding from the Client and/or other persons providing security for the Client's obligations;
- provision of reference (status enquiries) relating to the Client;
- conducting matching procedures by comparing data for producing or verifying data that may be used for or against the Client;
- enabling an actual or proposed assignee of Z.com or an actual or proposed participant, sub-participant or transferee of Z.com's rights in respect of the Client to evaluate the transaction intended to be the subject of the assignment, participation, sub-participation or transfer; and
- purposes relating to the above.

## Disclosure of Data

Depending on the circumstances and the specific data concerned we may disclose your information to:

- Other Group companies who provide financial services
- Outsourcing partners, service providers and specialist advisers who have been specifically contracted to provide us with these services.

- Introducing brokers with whom we have a mutual business relationship
- Regulatory bodies or law enforcement agencies
- Identity checking and reference agencies
- Providing you with up to date information or news that we believe may be relevant to you.

## **Security of Data**

We will keep data either electronically or in hard copy file format. We have developed and will maintain electronic and physical security procedures to safeguard personal data against loss, theft, copying and unauthorised disclosure, use or modification. Access to personal data is restricted to employees and authorised service providers who need it to perform their work. Our staffs are trained on their obligations regarding data security.

We must retain your data for specific time periods for regulatory purposes.

## **Cookies**

We may use cookies or IP address tracking devices on our website for administration purposes, to store password and usernames, to monitor visits to pages on this and other occasions from your terminal, to personalise our service to you and to track and facilitate browsing through our website. A cookie is a piece of data stored on your hard drive containing information about you relating to the use of the website. IP addresses may be linked to your personal data and by tracking these addresses, we would be obtaining such personal data. Access to the website is conditional on acceptance by you of any cookies and IP address tracking devices described in and for the purposes explained in this clause. By accepting the Agreement, you acknowledge that you understand the broad nature of cookies and IP address tracking devices and the purposes for which they will be used by us.

## **Language of Communications**

All GMO-Z.com Trade Limited legal documents are available in English. Translations into other languages are provided for referential purposes only. For the avoidance of doubt, the English version shall prevail in the event of any inconsistencies or ambiguities.