

Interactive FX UK Ltd's EU-Specific Privacy Policy

Effective Date: May 25, 2018

This Privacy Policy applies to EU residents only. If you are not an EU resident, our regular Privacy Policy applies to you.

Throughout this policy the entity responsible for the management, control and processing of your personal information is Interactive FX UK Limited (all rights reserved, 4 Borough High Street, London Bridge, London SE1 9QR, United Kingdom), also referred to in this document as "Interactive FX" and "we".

Interactive FX takes the issue of privacy very seriously and we are committed to protecting and respecting privacy throughout the processing of all personal information over the course of our business activities, whether it concerns our employees, customers, or suppliers and third-parties.

We control all of the personal information used in our platform for our own commercial purposes. Sometimes, we will process personal information on behalf of another data controller and when this happens, we do so in accordance with the instructions of that data controller and in accordance with the GDPR. If we are processing personal information on behalf of another data controller, that data controller will provide relevant information to you about how your data is being processed and shared. We do not accept any responsibility or liability for these policies or the security of these other data controllers.

This document explains how we collect, store, process, transfer and use data that identifies or is associated with you, as a natural person and which is subject to the GDPR. This applies to users located in the European Union. 'Personal information' covers all personal data as defined under Art. 4(1) GDPR.

Data Protection Principles

The GDPR lays out six principles to abide by while processing personal information. Interactive FX is compliant with these principles. Information that Interactive FX deals with must be:

1. Processed fairly, lawfully and in a transparent manner;
2. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
3. Adequate, relevant and limited to what is necessary;
4. Accurate and, where necessary, kept up to date;
5. Not kept for longer than necessary; and
6. Processed securely, maintaining integrity and confidentiality.

How do we collect your information?

While using our platform, we may collect information when:

- You provide information in relation to services we might provide to you;

- You submit an enquiry about our services;
- You sign up to our mailing list;
- You provide personal information directly to members of our team;

We also may collect passive information through the use of cookies.

We may collect information from other sources such as:

- Audited and GDPR-compliant purchased mailing lists
- Delegate lists from conferences
- When customers ask us to process personal information on their behalf
- In-house market research
- Marketing consultants
- Social media sites, law enforcement agencies, providers of denied party screening

What personal information do we collect?

Assuming your privacy settings permit access to the following information, the information collected includes the following:

Your name, gender, email address, language settings, time zone and a list of channels on which you have accounts (such as Facebook, Skype, Slack etc..) and an avatar picture as long as your privacy settings permit access to these pieces of information.

We may collect some information associated with your third-party account (such as your name, email address and time zone), if you use your account credentials with this third-party to log in to our platform.

We may collect, while you are using our website and platform, server logs from your browser or device, IP address, geolocation data, device identification, browser data, browser type (user agent, browser version, etc.), device type, device model, operating system version, screen resolution, information on your usage of our Website and online activities and information obtained with the use of cookies.

Why do we collect and use your personal information?

We will only use personal information when the law allows us to do so.

The reasons for using your personal information may differ depending on the purpose of the collection. Regularly, we use your information for the following purposes and on the following legal grounds:

- Where we need to enact a contract with you:
- To provide you with information or services that you have requested from us.
- To fulfil our obligations between you and us. This includes information to manage your account; information to enable the usage of our platform; information for invoicing and payment follow up.
- Where it is justified by our legitimate interests, including our business interests, we may use your information to assess and monitor our business performance, improve our services, identify potential cyber threats and/or build.

Please note that we have undertaken an assessment to determine that processing for those interests does not outweigh your interests and fundamental rights, considering the nature and impact of the processing and any relevant safeguards we can put in place.

We may use your email address and names for our email marketing campaigns. You can object to this use at any time by following the link to unsubscribe at the bottom of our marketing emails.

We may maintain a basic amount of information about you and your activity or transaction history (contact details, online identifiers, payment history and any information relating to personalisation status), in order to provide you with a service tailored to your preferences.

We may use your information to provide you with information, products or services that we feel may interest you or to notify you about changes to our service

We may collect, use and share aggregated data such as demographic data or frequency of usage data. Aggregated data may be derived from your personal information but is not considered "personal data" by law as this data does not reveal your identity. For instance, we may aggregate your website usage data to calculate the percentage of users accessing a specific website feature.

We may use your information only after we have received your approval. You are free to withdraw your consent at any time.

We may use your information for marketing campaign purposes only when you sign up to our email newsletter.

We may be obligated to retain certain information because of legal requirements, for example, tax or commercial laws.

In the event that we need to share information due to legal requirements, and if you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter with you. If this happens, we may have to cancel the services you have requested from us.

We may be in a situation where we may process your information without your consent or knowledge where required by law.

Use of your personal information

We may share your information with third-parties only under circumstances related to a business transaction such as a merger or acquisition, financing, or a bankruptcy scenario.

Other third-parties with whom we may share information may include promotional partners where we have partnered to provide promotional activities. We may also share information to advisors and service providers. These third-parties may conduct services for us or on our behalf, which may include providing mailing or email services, marketing campaign services, accounting and tax services, payment processing, data enhancement services, fraud prevention, web hosting, or providing analytics services.

We will only process personal information for the above purposes with your specific consent. You have the right to withdraw this consent at any time.

Retention of your information

We will store personal information for as long as necessary to fulfil the purposes for which we collect the data, in accordance with our legal obligations and legitimate business interests but we will not keep personal information in a form which permits identification of individuals for longer than is necessary for the purpose for which they were collected. We will take all reasonable steps to destroy, or erase from our systems, all data which is no longer necessary.

In general, information obtained in the course of providing our service will be blocked from general access within a few days and deleted within three years at the latest, unless we need to retain such data for our own legitimate interests, for example, as a defence against IT security threats. Some national commercial or financial rules may require us to retain certain information for up to ten years.

Our website may, from time to time, contain links to and from the websites of partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies or the security of these websites. Please check the relevant policy before you submit any personal information to these websites.

How do we secure your information

We have taken necessary steps from a technical and organisational point of view to secure and protect your personal information against destruction, loss, alteration, unauthorised disclosure or access while transmitting your data over a network and against all other unlawful forms of processing. We do so by using secure SSL encryption (when relevant), servers, firewalls and relevant use of other technologies. Our employees will only process your data as per our Privacy Policy and in the event that any employee breaches our Privacy Policy, her or she may be subject to disciplinary action.

We have put in place internal procedures to prevent such occurrence related to data security breaches and we will inform you and any relevant entities of such breach where we are legally required to do so.

International Transfer:

As we are located in United Kingdom while using Amazon's AWS Data Centre, any information you provide maybe be processed and stored in the USA, which means that the personal information of our EU residents may be kept in a jurisdiction that is less protective than that which the GDPR currently requires as standard.

In the event that we need to transfer such information from the EU to third-parties which are not subject to laws requiring the GDPR levels of protection, we will either enter into contracts which are based on the EU Standard Contractual Clauses with these parties or transfer information under the scope of the EU/US Privacy Shield.

Cookies:

A cookie is a small file of letters and numbers that we store on your hard drive or on your browser or device if you agree. Cookies contain information that is transferred to your device or computer for record-keeping purposes.

Our platform and website uses cookies, file information, web beacons, and similar technologies to recognise you from other users. By doing so, we can provide you with a better experience while using our website and platform.

Please note that you can block cookies by activating the relevant settings on your browser which allows you to not accept the settings of all or some cookies. You maybe not being able to access all or parts of our website should you decide to block cookies.

While using cookies and other tracking technologies, we may use the collected data to save you from having to enter your information each time you log in. This includes being able to be identified from multiple devices and enhances your user experience by providing you with personalised content and information, including advertising and targeted content. Using cookies also helps us to improve our services via our platform and monitor metrics on our website, as well as to assess and fix technology problems.

Your rights

Your rights are important to us. You have rights, under the GDPR and under certain circumstances, to access and ask for erasure of your personal information, under applicable privacy law, and a right to prevent certain processing activities.

Therefore, as EU resident, you have the right to:

- Obtain access to your personal information
- Obtain rectification of your personal information in the event that it is inaccurate or incomplete
- Obtain the erasure of your personal information without undue delay in certain circumstances, such as where the personal information is no longer necessary in relation to the purposes for which it was collected or processed
- Obtain restriction while processing your personal information where we hold inaccurate data related to you
- Obtain the possibility to move, copy or transfer your information from one entity to another

You also have the right to disable cookies through the settings in your browser and unsubscribe from our mailing list and those of our promotional partners if you no longer want to receive marketing e-mails from us.

In addition to the afore listed rights, as an EU resident, you have the right to lodge a complaint with your local data protection authority. Further information about how to contact your local data protection authority is available at http://ec.europa.eu/justice/data-protection/bodies/authorities/index_en.htm

Changes to our Privacy Policy

We reserve the right to change this privacy policy at any time. Where appropriate, we will notify individuals of those changes by post or email. Each time you enter or use our website, you agree that the privacy policy current at that time shall apply to all information we hold about you. It is important that the personal information we hold about you is accurate and current. Please keep us informed if your personal information changes during your relationship with us.

How to contact us?

If you have any questions or concerns about our Privacy Policy or if you want to exercise your rights, please send an email to support@inte-fx.com or write to us at Interactive FX UK Limited, 4 Borough High Street, London Bridge, London, SE1 9QR, United Kingdom