
Privacy Policy

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Risk Warning: CFDs are complex instruments and come with a high risk of losing money rapidly due to leverage. 95% of retail investor accounts lose money when trading CFDs with this provider. You should consider whether you understand how CFDs work and whether you can afford to take the high risk of losing your money.

Contents

Purpose	3
Introduction	3
Our Commitment to You	3
Collection of Personal Data	3
What kind of personal information do we collect and store?	4
Use of the Information.....	4
Protection of personal information	5
Security and Safeguard measures of Personal Information	7
Recording of Telephone Conversations and Electronic Communications.....	8
Security and policy for transmission of payment card details	8
Cookies	8
Contacting You.....	9
Change of Information.....	9
Right of Access.....	9
Restricted responsibility	10
Consent.....	10
Privacy Policy Updates.....	10

K-DNA Financial Services Ltd (hereinafter referred to as “K-DNA” or the “Company”), is a Cyprus Investment Firm licensed and regulated by the Cyprus Securities and Exchange Commission (“CySEC”) under license number 273/15, offers a variety of investment products to Retail, Professional and Eligible Counterparties (the “Clients”). The Company is located at 56 Griva Digeni street, Anna Tower, Floor 1, 3063 Limassol, Cyprus. FINMARKET is a brand owned and operated by K-DNA Financial Services Ltd.

Purpose

Our Privacy Policy below describes in detail how the company handles the collection, management and protection of all confidential Client’s information.

Introduction

The Company and its related entities are responsible for the protection of the privacy and the safeguarding of clients’ personal and financial information. By opening a trading account with the Company, the client hereby gives its consent to such collection, processing, storage and use of personal information by the Company as explained below.

This policy, forms part of the Client’s agreement with the Company and therefore by entering into an agreement with the Company you also agree to the terms of this Policy, as set out in this document.

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 personal data.

Collection of Personal Data

If you decide to apply to open an account or a demo account with us (or in any other circumstances that is

deemed necessary in the course of our business relationship) and hence become our Client there is certain information that we will require from you in order to do so.

What kind of personal information do we collect and store?

As part of our business, we collect personal data from customers and potential customers that include, but not limited to the following:

- First name, last name, contact details, date of birth and gender
- Income source, net worth, wealth, assets and liabilities, account balances, trading statements, tax and financial statements
- Profession and employment details
- Trading knowledge and experience, risk tolerance and risk profile
- Information from documents that you provide to us to verify your identity, such as your passport, utility bills, bank statements etc
- Payment Details including credits cards/ debit cards, bank account details, e-wallets etc

In this respect, we may collect Your Information directly from you (in your completed Account Opening Application Form or other way) 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.

Use of the Information

The Company 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.

The Company uses clients' personal information only as required to provide quality service and security to its clients. This information helps the Company to improve its services, customize browsing experience and enables it to inform its clients of additional products, services or promotions relevant to clients and in this respect, the clients hereby consent to the usage of this data for such purposes.

If the clients do not want to receive information of this nature for any reason, they can contact the Company at the following email support@finmarket.com.

Protection of personal information

Any personal information is treated as confidential and may be shared only within the Company, by its employees and affiliates for business purposes, as permitted by the applicable law 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.

The information may be disclosed to third parties, such as the **Company Partners** and **Affiliates** for the purposes stated above only. Our Company Partners, Affiliates, and Business Introducing maintain the privacy of your information to the same extent the Company does in accordance with this policy.

Information may also be provided to **non-affiliated companies**, providing professional, legal, and accounting services. Non-affiliated companies that assist the Company in providing services to you are required to maintain the confidentiality of such information and to use your personal information only in the course of providing such services for the purposes that the Company dictates and within the ambit of the applicable law. Such cases are:

- a) Where required by law or a court order by a competent Court; in case such disclosure is required to be made by law or any regulatory authority, it will be made on a 'need-to-know' basis, unless otherwise instructed by the regulatory authority;
- b) Where requested by CySEC or 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 such an extent as reasonably required so as to execute Orders and for purposes ancillary to the provision of the Services;
- 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 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 third parties engaging with the Company to help carry out certain internal functions such as account processing, fulfillment, client service, or other data collection activities relevant to the Company's business;
- i) To credit reporting or collection agencies as reasonably required in order to provide the services to Company and/ or its clients;
- j) 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);
- k) 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;
- l) To market research call centers that provide telephone or electronic mail (e-mail) surveys with the purpose to improve the services of the Company, in such a case only the contact details data will be provided;
- m) Where necessary in order for the Company to defend or exercise its legal rights to any court or tribunal or arbitrator or Ombudsman or governmental authority;
- n) At the Client's request or with the Client's consent;
- o) To permitted successors or assignees or transferees or buyers, with fifteen (15) Business Days prior written notice to the Client;
- p) Client Information is disclosed in relation to US taxpayers to the Inland Revenue in the Republic of Cyprus, which will in turn report this information to the Internal Revenue Service (IRS) of the U.S. according to the Foreign Account Tax Compliance Act (FATCA) of the USA and the relevant intergovernmental agreement between the Republic of Cyprus and the U.S.

Client information is disclosed in compliance with the common reporting standard (CRS) for the automatic exchange of financial account information developed by the Global Forum of the Organization for Economic Co-Operation and Development (OECD); in the cases where your tax residence is located outside Cyprus, the Company may be legally obliged to pass on the information and other financial information with respect to your financial accounts to Cyprus tax authorities and they may exchange this information with tax authorities of another jurisdiction or jurisdictions pursuant to intergovernmental agreements to exchange financial account information. Under such circumstances, the Company shall expressly inform the third party regarding the confidential nature of the information.

Use of the shared information is strictly limited to the performance of the above and is not permitted for any other purpose. All third parties with which the Company shares personal information are required to protect such personal information in accordance with all relevant legislation and in a manner similar to the way the Company protects the same. The Company will not share personal information with third parties which it considers will not provide its clients the required level of protection.

In cases where clients have been introduced by a Business Introducer, such Business Introducer may have access to clients' information. Hence, clients hereby consent to the sharing of information with such Business Introducer.

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.

The Company will not sell or give away your name, mailing address, phone number, email address or any other information to anyone. The Company will use various security measures to protect your information from unauthorized users.

The account information (client account) will be secured by a password, the password will be encrypted and is known only to the client.

Security and Safeguard measures of Personal Information

The Company takes the safeguarding of your data very seriously. The Company has taken measures and precautions to protect the security of your personal information. Our employees understand to respect the confidentiality of your personal information. We have secure servers that your personal information is stored in. We limit access of your Information only to those employees or partners that need to know the information in order to enable the carrying out of the agreement between us. We have procedures in place regarding how to safeguard and use your Information, for example by requesting our affiliates and employees to maintain the confidentiality of your Information. When we consider that the personal information is no longer needed, we will remove any details that will identify you and we will securely destroy the records.

Please note that we are subject to certain laws and regulations which require us to retain a copy of the documents we used to comply with our customer due diligence obligations, supporting evidence and

records of transactions with you and your relationship with us for a period of five (5) years after our relationship with you has terminated. The records, will at least contain Client personal data, trading information, account opening documents, communications and anything else which relates to the Client.

Personal information held in the form of a deed/contract/agreement is subject to a storage period of six (6) years after our relationship with you has terminated based on the applicable Cyprus legal framework.

Recording of Telephone Conversations and Electronic Communications

Telephone conversations and electronic communications between the client and the Company will be recorded and kept by the Company for a period of up to seven (7) years and recordings will be the sole property of the Company. The Client accepts such recordings as conclusive evidence of conversations so recorded. Such recordings shall be provided to the client upon request.

Security and policy for transmission of payment card details

In accordance with the recommendations of Payment Card Industry Security Standards Council, customer card details are protected using Transport Layer encryption — TLS 1.2 and application layer with algorithm AES and key length 256 bit.

Cookies

The Company uses cookies to gather information about your access to FINMARKET website and other services we provide to you.

Cookies are small pieces of information which use a unique identification tag and are stored on your device as a result of you using FINMARKET website or other services we provide to you. Most internet browsers are set up to accept cookies.

If you do not wish to receive cookies, you may be able to change the settings of your browser to refuse all cookies or to have your computer notify you each time a cookie is sent to it, and thereby give yourself the choice whether to accept it or not. However, this may impair the quality of the services that we

provide to you in relation to your account.

The client agrees and acknowledges that the company may use and collect existing or further information or both to treat you fairly, and to understand your financial objectives and to ensure that relevant services are appropriate to your profile as well as to improve the services we are providing to you and to inform you of additional products, new services, promotional offers or any other marketing information. In case you do not want to get any information or promotional emails you should send a request to info@finmarket.com

Contacting You

We may, for the purpose of administering the terms of our Agreement between us, from time to time, make direct contact with you by telephone, fax, email, or post. If you agree, we or any of our Affiliates of the Company or any other company in our group, may make contact with you from time to time, by telephone, fax, email or post for marketing purposes to bring to your attention products or services that may be of interest to you or to conduct market research.

Clients consent to the receipt of such contact when they consent to our terms and conditions of use when registering with the Company. Any person wishing to opt out of further contact with the Company at any time whatsoever is entitled to do so, simply by contacting the Company whether by phone +357 25254070 or email at support@finmarket.com and requesting that no further contact on behalf of the Company be made.

Change of Information

You may inform the Company at any time that Your Information has changed or that you wish the Company to delete information we hold about you by emailing us at info@finmarket.com. We will change or delete Your Information in accordance to your instructions, except to the extent that we are required to hold Your Information for regulatory or legal purposes, to provide you with the Services you have requested or to maintain adequate business records.

Right of Access

Under the Processing of Personal Data (Protection of the Individual) Law of 2001, as amended or replaced from time to time, you as a natural person have the right to obtain a copy of any personal information which

we hold about you and to advise us of any perceived inaccuracy. To make a request, please contact us, verifying your identity and specifying what information you require. We may charge an administrative fee. You may contact us via e-mail at info@finmarket.com.

Restricted responsibility

K-DNA Financial Services LTD is not responsible for third party websites which are linked to www.kdna-investment.com and www.finmarket.com and has no control of the use or the protection of the information. Each time that a client is required to provide information for a link website which is a third party website the information is recorded by the third party and under his responsibility and is not subject to the Company's privacy standards and procedures.

Consent

By visiting and/or accessing FINMARKET website, you consent to FINMARKET to collect, maintain and use your personal information as per this Policy.

Privacy Policy Updates

K-DNA Financial Services LTD reserves the right to update the privacy policy whenever this is deemed to be appropriate.

The update will be posted in FINMARKET website, the client accepts posting updated privacy policy as official notice to the client.

K-DNA Financial Services LTD encourage the client to check and to be updated regarding the privacy policy agreement and other agreement under the legal documentation section.

In case of further questions of information do not hesitate to contact us at info@finmarket.com.