



**LIBERTEX INTERNATIONAL COMPANY LLC  
PRIVACY POLICY,  
INTERNAL PRIVACY CONTROLS POLICY & COOKIES POLICY  
OCTOBER 2024**

**LIBERTEX INTERNATIONAL COMPANY LLC** is a legal entity acting under the laws of Saint Vincent and the Grenadines, registered under the number 1278 LLC 2021 with its registered address at The Jaycees Building, Kingstown, St. Vincent & the Grenadines

**Table of Contents**

<b>1. OVERVIEW</b>	<b>3</b>
<b>2. PRIVACY POLICY &amp; POLICY ON INTERNAL PRIVACY CONTROLS</b>	<b>3</b>
<b>2.1. INFORMATION COLLECTED BY US</b>	<b>3</b>
<b>3. HOW WE USE YOUR NON-PUBLIC INFORMATION</b>	<b>5</b>
<b>4. WHO DO WE SHARE YOUR PERSONAL INFORMATION WITH?</b>	<b>6</b>
<b>5. RETENTION OF RECORDS</b>	<b>7</b>
<b>6. COOKIES</b>	<b>7</b>
<b>7. THE PROTECTION OF NON-PUBLIC INFORMATION</b>	<b>7</b>
<b>8. YOUR CONSENT</b>	<b>8</b>
<b>9. QUERIES &amp; COMPLAINTS</b>	<b>8</b>

## 1. OVERVIEW

**LIBERTEX INTERNATIONAL COMPANY LLC** (hereinafter: “We”, the “Company”) is a legal entity acting under the laws of Saint Vincent and the Grenadines, registered under the number 1278 LLC 2021, with its registered address at The Jaycees Building, Kingstown, St. Vincent & the Grenadines.

The Company places a high priority on the privacy and integrity of the personal information of our Clients, both present and future. The Company strives to ensure the safety and confidentiality of all information received from the Client. This Privacy & Internal Privacy Controls Policy (the "Policy") describes how the Company collects, uses and protects the personal information of the Client.

By registering an account for the provision of the Company's services, the Client confirms by an affirmative action that he/she read and accepted the content of this document and, thus, confirms that consent is given for the processing of certain personal information for the purposes of using the Company's services through the Company's Online Trading System(s).

We ask that you read this privacy notice carefully as we would like to inform you that your privacy on the internet is of crucial importance to us, and the notice also contains important information on who we are; how and why we collect, store, use and share personal information; your rights in relation to your personal information and on how to contact us if you have a complaint.

## 2. PRIVACY POLICY & POLICY ON INTERNAL PRIVACY CONTROLS

The Company, acting as 'controller' of personal data under applicable rules of personal data protection and processing, routinely collects personal, confidential and sensitive non-public information ("Non-Public Information") from its Clients that are necessary to administer its business and carry out its regulated activities in an effort to provide Clients with superior service.

### 2.1. INFORMATION COLLECTED BY US

The provision of certain personal information is required from you in the course of subscribing to our services as a client and will be collected and stored for administrative, service related and/or legal purposes.

We shall limit the collection of personal information to what is necessary to administer our business and carry out our regulated activities in an effort to provide you with superior service.

Such information includes:

- Personal information such as your first name and surname, date of birth, national

identification number, e-mail address, and phone number

- Financial Information, trading experience and employment information for assessing appropriateness will also be collected.

However, the meaning of data “provided to” the Company is not limited to this. It is also personal data resulting from observation of your activities (i.e when using a device or service).

This may include:

- History of website usage or search activities, details of your visits to our Website including, communication data;
- Traffic and location data;
- Website traffic pattern information, including IP address, operating system and browser type, for system administration and to report aggregate information to our advertisers. This kind of information is only used in masked or aggregated form, which means that the individual user will not be recognisable. These data do not identify any individual.
- Communications between you and us via Live Chat, email, or telephone call.

The types of data we collect, along with the purpose for collection, are listed below:

<b>Personal data type:</b>	<b>Purpose:</b>
Personal information such as first and surname, date of birth and address.	To meet our anti-money laundering (AML) and other regulatory obligations in relation to Know Your Client (KYC) and client due diligence.  To verify your identity using our verification processes.
Contact information (e-mail address and phone number).	In order to enable communication with you in relation to the services provided and to fulfil our regulatory and compliance obligations.
Employment information, financial information, relevant education and trading experience information.	In order to comply with KYC and AML obligations.
Ethnicity, citizenship and social security numbers or national identity and passport numbers.	In order to comply with KYC and regulatory reporting and other AML obligations.

The Company is committed to safeguarding this information so that its confidentiality can be maintained and the unauthorised access/use or unnecessary disclosure of this information can be prevented.

If the Client does not wish the Company to process Non-Public Information, the Client should inform the Company in writing by sending an email at [support@help.fxclub.org](mailto:support@help.fxclub.org) or a letter by registered post at the registered office of the Company that is indicated at the end of the document. It is noted, however, that if the Client wishes to opt out, the Company may not be able to continue providing information, services and products requested by the Client, and the Company shall have no liability to the Client in this regard.

The Company will not use or disclose Non-Public Information for any purpose other than for the performance of business activities or if required by law.

This Policy describes how the Company protects and handles the Non-Public Information it collects on customers who apply for or receive its products and services. The provisions of this Policy apply to current, former and prospective customers of the Company.

### 3. HOW WE USE YOUR NON-PUBLIC INFORMATION

We use information held about you in the following ways:

- To ensure that the content on our Website is presented to you in the most effective manner and to improve the content of our Website.
- To communicate with you, contact you and provide you with products and services that you request from us or, where you have indicated to be contacted, for products and services that we feel may be of interest to you.
- To manage and administer the products and services provided to you.
- To keep you updated as a Client in relation to changes to our services and relevant matters
- To provide, improve, test and monitor the effectiveness of our Services.
- To develop and test new products and features.
- To monitor metrics, such as the total number of visitors, traffic and demographic patterns
- To diagnose or resolve technology problems.
- To carry out our obligations arising from any contracts entered between you and us.
- To use your data or permit selected third parties and our processors to use your data to provide you with information about goods and services that may be of interest to you, and they or we may contact you about these by e-mail.
- To notify you about updates to the Website.

- To send out newsletters or information about other opportunities that we believe will be of interest to you. We will only send this to you if you have indicated that you wish to receive such information, and we will respect your wish not to do so if you communicate such a wish to us. You can opt out of receiving marketing communications at any time if you do not wish to receive such marketing material by clicking "unsubscribe" or by sending an e-mail request to [support@help.fxclub.org](mailto:support@help.fxclub.org).
- To promote safety and security. We use the information we have to help verify accounts and activity and to promote safety and security on our regulated services, such as by investigating suspicious activity or violations of our terms or policies. We work hard to protect your account using teams of IT specialists, automated systems, and advanced technology such as encryption.

#### 4. WHO DO WE SHARE YOUR PERSONAL INFORMATION WITH?

We assure you that your information will not be leased or sold to external third parties beyond the Company (Group of companies) without obtaining your consent. We also enforce stringent limitations on how our data processors can utilize and disclose the data we furnish. The following are the categories of external parties with whom we exchange information:

- Service providers and affiliated partners: We transfer information to service providers (processors) and affiliated partners who provide comprehensive global support to our operations. This includes technical infrastructure services, trading platforms for analyzing Service usage (like measuring ad and service effectiveness), delivering customer service and support, providing training material and support, facilitating client onboarding, verifying client identities (including PEPs and sanctions checks), conducting marketing communications and design, overseeing website management, and handling software and business development services.
- Measurement and Analytics Services: We collaborate with partners who utilize our analytics services, such as Google Analytics (limited to Non-Personally Identifiable Information only). We do not share personally identifiable information (like name or email) with advertising, measurement, or analytics partners.

The Company conducts thorough due diligence when selecting processors, ensuring that they offer adequate safeguards, particularly in terms of expertise, data governance, data security, cyber resilience, reliability, and resources to implement technical and organizational measures. This guarantees that processing aligns with applicable laws and safeguards data subject rights.

Any third party that the Company shares user data with is bound to uphold the same or equivalent level of user data protection as outlined here.

The adherence of processors to a Service Level Agreement (SLA) contract serves as evidence of compliance with the controller's obligations.

In cases mandated by applicable law, we may share personal information with law enforcement or other relevant authorities.

## 5. RETENTION OF RECORDS

The Company will keep personal data only as long as necessary, including for the purposes of updating the product or services or as required by law for audit trail purposes. When the personal data is no longer required, it will be destroyed either by shredding or other approved destruction methods to prevent unauthorised parties from gaining access to the information during and after the process.

We will safeguard information in our custody.

We have developed and will maintain 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.

## 6. COOKIES

What are cookies? Cookies are small pieces of information sent by a web server to store on a web browser so it can be read back later from that web browser. They are used to help your browser remember your choices and display the correct information for you - such as items in your basket - and not treat you as a new visitor each time you visit a page. Cookies may be used on some pages of the Website for us to provide Website users with a more customised web browsing experience in a way that we will be able to distinguish you from other users of our Website.

Some cookies are only set for the duration of your visit ("session cookies") to navigate and provide you with relevant information. Others are set for longer periods ("persistent cookies") so that your browser can remember your choices from a previous visit. The cookies stored cannot harm your device and are anonymous and unique to your browser.

You can choose to disable or block these cookies in your browser, but without some of them, our Website will not work. For more detailed information about cookies, please visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

## 7. THE PROTECTION OF NON-PUBLIC INFORMATION

The Company takes the issue of security very seriously and ensures that all possible measures to ensure the security of your confidential information, including adhering to strict standards for the internal use of confidential information and using leading data storage technology.

When making a payment with a credit/debit card, the Client will be transferred to the Website of the processing centre, where a form has to be filled in. To prevent the unauthorised use of

your credit/debit card, the Client's card information is transmitted to the Company in a shortened form and through a secure server. In certain exceptional circumstances, the Company may refund payments made by credit or debit card. In this case, the funds will be refunded to the card that was used for the deposit.

We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

The Company may occasionally share Non-Public Information with its affiliates or third-party service providers and joint marketers not affiliated with the Company. This information may be shared for a variety of purposes, such as to support the financial products and services provided to Clients, to service Client Accounts, to cooperate with regulatory authorities and law enforcement agencies, to comply with court orders or other official requests, or, as necessary, to protect the Company's rights or property.

## **8. YOUR CONSENT**

By registering a trading account and accessing our Website and our Online Trading System(s), you accept the Client Agreement and this Privacy Policy, and you consent to the Company collecting, maintaining, using and disclosing your Personal Data in accordance with the terms of this Policy.

## **9. QUERIES & COMPLAINTS**

We hope that our client support or compliance team can resolve any query or concern you raise about our use of your information.

If you have privacy questions that are not answered by this Privacy Policy or any other concerns about how we use your personal data, please write to us at [support@help.fxclub.org](mailto:support@help.fxclub.org).