

PRIVACY POLICY

1. Privacy Statement

This website is operated by Ava Trade Limited ("we, us or our"). It is our policy to respect the confidentiality of information and the privacy of individuals. We comply with our legal obligations in relation to applicable data protection laws, specifically in relation to the General Data Protection Regulation (GDPR) 2016/679.

Our EU nominated representative is Ava Trade EU Limited.

Protecting the privacy and safeguarding the personal and financial information of our Affiliates is one of our highest priorities. The following Privacy Statement explains how we collect and protect your information. By registering, or by using our Web site, you give your consent to the collection and use of personal information by us as explained in this privacy statement.

This privacy statement explains when and why we collect personal information, how we use it, the conditions under which we may disclose it to others and how we keep it secure.

2. Collection of personal information

We collect information required for registration and to transact business effectively.

The information we collect directly from you includes information required to communicate with you, including your name, mailing address, telephone number, e-mail address and to identify who you are.

3. Usage of personal information

We use personal information to maintain business communications and security. For example, we may use the information collected from you to verify your identity and contact information. We may also use this information to establish and set up your affiliate account, issue an account number and a secure password, maintain your account activity, and contact you with account information. This information helps us improve our services to you, customize your browsing experience and inform you about additional products, services or promotions that may be of interest to you.

We may use your information for the following purposes:

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- Send you marketing communications which you have requested. These may include information about our products and services, events, activities, and promotions of our associated partners' products and services.
- Send you information about the products and services.
- Provide you content and venue details on a webinar or event you signed up for.
- Reply to a 'Contact me' or other web forms you have completed on one of our websites.
- Follow up on incoming requests (support, emails, chats, or phone calls).
- Perform legal and contractual obligations such as order confirmation, license details, invoice, reminders, and similar.
- Notify you about any disruptions to our services (system messages).
- Contact you to conduct surveys about your opinion on our products and services.

4. Security

All information you provide to us is stored on secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Web site, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Web site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

Use of "Cookies"

We use cookies to assist us in securing your activities and to enhance the performance of our Web site. (Cookies are small text files sent from the Web server to your computer.) Cookies used by us do not contain any personal information nor do they

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contain account or password information. They merely allow the site to recognize that a page request comes from someone who has already logged on.

We may share Web site usage information about visitors to the Web site with reputable advertising companies for targeting our Internet banner advertisements on this site and other sites. For this purpose, pixel tags (also called clear gifs or web beacons) may be used to note the pages you have visited. The information collected by the advertising company through the use of these pixel tags is not personally identifiable.

If you wish to block cookies, you may do so through your browser's settings. You can delete cookies that are already on your computer and you can set your browser to prevent them from being placed going forward. Please refer to the browser's help menu for further information. However, please bear in mind that disabling cookies may adversely affect your user experience on the Service. To learn more about how to reject cookies, visit www.allaboutcookies.org

5. Your Rights

You have the right to request a copy of the information held by us about you. You also have the right to access your data, have changed any inaccuracies in the details we hold about you, the right to object to the use of your data and the right to block any specific uses of your data, by means of a request in writing to AVA Trade EU Limited, AvaTrade Financial Centre, Five Lamps Place, Amiens Street, Dublin 1, Ireland

Our legal basis for collecting personal data

Collecting personal data based on consents

The collection of personal data based on consent from the data subject will be done by using "Consent Forms" that will store documentation related to the consent given by the individual. Individual consents will always be stored and documented in our systems.

Collecting personal data based on contracts

We use personal information for fulfilling our obligations related to contracts and agreements with customers, partners and suppliers.

Collecting personal data based on legitimate interest

We may use personal data if it is considered to be of legitimate interest, and if the privacy interests of the data subjects do not override this interest. Normally, to establish

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the legal basis for data collection, an assessment has been made during which a mutual interest between us and the individual person has been identified.

How long do we keep your personal data?

We store personal data for as long as we find it necessary to fulfil the purpose for which the personal data was collected, while also considering our need to answer your queries or resolve potential problems, to comply with legal requirements under applicable laws, to attend to any legal claims/complaints, and for safeguarding purposes.

This means that we may retain your personal data for a reasonable period of time after your last interaction with us. When the personal data that we have collected is no longer required, we will delete it in a secure manner. We may process data for statistical purposes, but in such cases, data will be anonymized.

Your rights to your personal data

YOU HAVE THE FOLLOWING RIGHTS WITH RESPECT TO YOUR PERSONAL DATA:

- The right to request a copy of your personal data that we hold about you.
- The right to request that we correct your personal data if inaccurate or out of date.
- The right to request that your personal data is deleted when it is no longer necessary for us to retain such data for legal and contractual purposes.
- The right to withdraw any consent to personal data processing at any time. For example, your consent to receive e-marketing communications:
- The right to request that we provide you with your personal data and, if possible, to pass on this information directly (in a portable format) to another data controller when the processing is based on consent or contract.
- The right to request a restriction on further data processing, in case there is a dispute in relation to the accuracy or processing of your personal data.
- The right to object to the processing of personal data, in case data processing has been based on legitimate interest and/or direct marketing.
- The right to complain to us and/or the Data Protection Commission.
- You can submit your request or complaint to following email: complaints@avatrade.com

6. Changes to This Privacy Statement

From time to time, we may update this Privacy Statement. In the event we change this Privacy Statement, the revised Privacy Statement will promptly be posted to the Web sites and we will post a notice on our Web sites informing you of such changes. You agree to accept posting of a revised Privacy Statement electronically on the Web site as actual notice to you. Any dispute over our Privacy Statement is subject to this notice and our Affiliates Agreement. We encourage you to periodically check back and review this policy so that you always will know what information we collect, how we use it, and to whom we disclose it. If you have any questions that this statement does not address, please contact an Affiliates Services representative.