



Privacy Policy

Logikfx Group
<http://www.logikfx.co.uk> | support@logikfx.com
Privacy Policy | January 18th, 2019

1. Summary

- 1.1 Our Privacy Policy below describes in detail how Logikfx handles the collection, management and protection of all confidential user information.
- 1.2 Your privacy is very important to us. We are committed to protecting and respecting your personal data. This Privacy Policy describes what types of personal data we collect about you when you choose to use our services, how we will use your personal data, when and with whom we share it and how we will keep it safe. It also details your rights in respect of our processing of your personal information and how you may exercise them. Please take the time to read and understand this policy.
- 1.3 We may make changes to this Notice from time to time and it is important that you check this Notice for any updates. Any personal information we hold will be governed by the current privacy notice at the given time. If we make changes, we consider to be important, we will communicate them to you.
- 1.4 Please note that this notice is addressed to customers and potential customers. If you are a Logikfx employee, a contractor to Logikfx or a third-party service provider, your personal information will be used in connection with your employment contract, your contractual relationship or in accordance with our separate policies which are available by contacting us.
- 1.5 Any reference to 'us', 'our', 'we' or 'Logikfx' in this privacy notice is a reference to each group company within the Logikfx Group as the context requires unless otherwise stated. Similarly, any reference to 'you', 'your', 'yours' or 'yourself' in this privacy notice is a reference to any of our customers and potential customers as the context requires unless otherwise stated.
- 1.6 By accessing our websites, including using any of the communication channels to contact us, we consider that you have read and understood the terms of this notice and how we process any information you disclose to us including personal data prior to becoming a client. Once you open an account with us you agree that this notice, including any amendments, will govern how we collect, store, use, share and in any other form process your personal data and your rights during our business relationship and after its termination.

2. Who are we?

2.1 This privacy notice applies to the processing activities of the following data controller entities within the Logikfx group of companies, which are:

- a. Logik Fx Limited, a company registered in England and Wales with incorporation number 11304257

3. What kind of information do we collect and store?

3.1 As part of our business we collect personal data from customers and potential customers that include the following:

- a. Name, surname and contact details
- b. Date of birth and gender
- c. Location data
- d. IP address, device specification
- e. Bank account, e-wallets and credit card details
- f. Details of your visits to our Website or our Apps including, but not limited to, traffic data, location data, weblogs, and other communication data.

3.2 We use cookies to store and collect information about your use of our Website. Cookies are small text files stored by the browser on your equipment's hard drive. They send information stored on them back to our web server when you access our Website. These cookies enable us to put in place personal settings and load your personal preferences to improve your experience. You can find out more about our cookies on our "Cookies Policy" available on our Website.

3.3 We may ask for other personal information voluntarily from time to time (for example, through market research, surveys or special offers). If you choose not to provide the information, we need to fulfil your request for a specific product or service, we may not be able to provide you with the requested product or service.

3.4 We may record any communications, electronic, by telephone, in person or otherwise, that we have with you in relation to the services we provide to you and our relationship with you. These recordings will be our sole property and will constitute evidence of the communications between us. Such telephone conversations may be recorded without the use of a warning tone or any other further notice.

4. Who may we disclose personal information to?

4.1 As part of using your personal information for the purposes set out above, we may disclose your information to:

- a. third party apps providers when you use our apps, communication systems and trading platforms which are provided to us by third parties;
- b. service providers and specialist advisers who have been contracted to provide us with services such as administrative, IT, analytics and online marketing optimization, financial, regulatory, compliance, insurance, research or other services;
- c. brokers and affiliates with whom we have a mutual relationship;
- d. Payment service providers and banks processing your transactions;
- e. auditors or contractors or other advisers auditing, assisting with or advising on any of our business purposes;
- f. courts, tribunals and applicable regulatory authorities as agreed or authorised by law or our agreement with you
- g. government bodies and law enforcement agencies where required by law and in response to other legal and regulatory requests;
- h. any third-party where such disclosure is required in order to enforce or apply our Terms and Conditions of Service or other relevant agreements;
- i. anyone authorised by you.

4.2 We endeavour to disclose to these third parties only the minimum personal data that is required to perform their contractual obligations to us. Our third-party service providers are not permitted to share or use personal data we make available to them for any other purpose than to provide services to us.

4.3 Our websites or our apps may have links to external third-party websites. Please note, however, that third party websites are not covered by this privacy notice and those sites are not subject to our privacy standards and procedures. Please check with each third party as to their privacy practices and procedures.

5. How do we use your information?

5.1 To facilitate account creation and logon processes.

- a. If you choose to link you account with us to a third-party account* (such as your Google or Facebook account), we us the information you allowed us to collect from those third parties to facilitate account creation and logon process. See the section below headed “how do we handle your social logins” for further information.

5.2 To send marketing and promotional communications.

- a. We and/or our third-party marketing partners may use the personal information you send to use for our marketing purposes, if this is in accordance with your marketing preferences. You can opt-out of our marketing emails at any time.

5.3 To send administrative information to you.

- a. We may use your personal information to send you product, service and new feature information and/or information about changes to our terms, conditions, and policies.

5.4 Fulfil and manage your orders.

- a. We may use your information to fulfil and manage your orders, payments, returns and exchanges made through the sites.

5.5 To post testimonials.

- a. We post testimonials on our Sites that may contain personal information. Prior to posting a testimonial, we will obtain your consent and use your name and testimonial. If you wish to update, or delete your testimonial, please contact us at support@logikfx.com and be sure to include your name, testimonial location, and contact information.

5.6 Deliver targeted advertising towards you.

- a. We may use your information to develop and display content and advertising (and work with third parties who do so) tailored to your interests and/or location and to measure its effectiveness.

5.7 Administer prize draws and competitions.

- a. We may use your information to administer prize draws and competitions when you elect to participate in competitions.

5.8 Request feedback.

- a. We may use your information to request feedback and to contact you about your use of our sites.

5.9 To protect our sites.

- a. We may use your information as part of our efforts to keep our sites safe and secure (for example, for fraud monitoring and prevention).

5.10 To enable user-to-user communications.

- a. We may use your information in order to enable user-to-user communications with each user's consent.

- 5.11 To enforce our terms, conditions and policies.
- 5.12 To respond to legal requests and prevent harm.
 - a. If we receive a legal request, we may need to inspect the data we hold to determine how to respond.
- 5.13 For other business purposes
 - a. We may use your information for other business purposes, such as data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and to evaluate and improve our sites, products, services, marketing and your experience.

6. When and how do we obtain your consent?

- 6.1 We may process your personal data for one or more lawful bases of processing (“Lawful Basis”) depending on the specific purpose for which we are using your data. The lawful basis is the following:
- a. to perform our contractual obligations towards you
 - b. to be compliant with the legal and regulatory requirements
 - c. to pursue our legitimate interests
- 6.2 Where our use of your personal information does not fall under one of these three Lawful bases, we require your consent. Such consent shall be freely given by you and you have the right to withdraw your consent at any time by contacting us using the contact details set out in this privacy notice or by unsubscribing from email lists.

7. Management of personal information

- 7.1 We are committed to safeguarding and protecting personal data and will implement and maintain appropriate technical and organisational measures to ensure a level of security appropriate to protect any personal data provided to us from accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to personal data transmitted, stored or otherwise processed.
- 7.2 We have appointed a Data Protection Officer to ensure that our management of personal information is in accordance with this privacy notice and the applicable legislation.
- 7.3 We require organizations outside the Logik Fx Limited who handle or obtain personal information acknowledge the confidentiality of this information, undertake to respect any individual’s right to privacy and comply with all relevant data protection laws and this privacy notice.

7.4 In brief, the data protection measures we have in place are the following:

- 7.4.1 we train our employees who handle personal information to respect the confidentiality of customer information and the privacy of individuals
- 7.4.2 requiring our employees to use passwords and two-factor authentication when accessing our systems;
- 7.4.3 We apply data encrypting technologies during data transmission during internet transactions and client access codes transmitted across networks
- 7.4.4 employing firewalls, intrusion detection systems and virus scanning tools to protect against unauthorised persons and viruses entering our systems;
- 7.4.5 using dedicated secure networks or encryption when we transmit electronic data for purposes of outsourcing;
- 7.4.6 practising a clean desk policy in all premises occupied by us and our related bodies corporate and providing secure storage for physical records; and
- 7.4.7 employing physical and electronic means such as access cards, cameras and guards to protect against unauthorised access.

8. How do we hold your information?

- 8.1 We hold personal information in a combination of secure computer storage facilities and paper-based files and other records and take steps to protect the personal information we hold from misuse, loss, unauthorised access, modification or disclosure.
- 8.2 We will only keep your information for as long as it is necessary for the purposes set out in this privacy policy, unless a longer retention period is required or permitted by law (such as tax, accounting or other legal requirements). No purpose in this policy will require us keeping your personal information for longer than 2 years past the termination of the user's account.

9. What are your rights?

Please note that these rights do not apply in all circumstances. You are entitled to:

- 9.1 request access to your personal data (commonly known as a “data subject access request”);
- 9.2 request correction of the personal data that we hold about you;
- 9.3 request erasure of your personal data. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request;
- 9.4 object to processing of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms;
- 9.5 request restriction of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - 9.5.1 if you want us to establish the data’s accuracy;
 - 9.5.2 where our use of the data is unlawful, but you do not want us to erase it;
 - 9.5.3 where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims; or
 - 9.5.4 you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it;
- 9.6 request the transfer of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information (i.e. not to hard copies) which you initially provided consent for us to use or where we used the information to perform a contract with you; and
- 9.7 withdraw consent at any time where we are relying on consent to process your personal data.
- 9.8 Please complete the personal data request by email using the registered email address you disclosed to us, to the following email address: support@logikfx.com.
- 9.9 We try to respond to all requests within 1 (one) month. Occasionally, it may take us longer than 1 (one) month if your request is particularly complex or you have made a number of requests. In this case, we will notify you within 1 (one) month of the receipt of your request and keep you updated.

9.10 We may charge you a reasonable fee when a request is manifestly unfounded, excessive or repetitive, or we receive a request to provide further copies of the same data. In this case we will send you a fee request which you will have to accept prior to us processing your request. Alternatively, we may refuse to comply with your request in these circumstances.

10. Query or Complaint

- 10.1 If you want to exercise your rights, please contact us by email at support@logikfx.com using the registered email address you disclosed to us.
- 10.2 We try to respond to all requests within 1 (one) month. Occasionally, it may take us longer than 1 (one) month if your request is particularly complex or you have made a number of requests. In this case, we will notify you within 1 (one) month of the receipt of your request and keep you updated.
- 10.3 Our Data Protection Officer (DPO), Marcus Raiyat can be contacted at marcus.raiyat@logikfx.com