

# PRIVACY POLICY

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## 1. Introduction

As part of our daily business operations Tifia Markets Limited needs to collect personal information from our clients and prospective clients in order to provide them with our products and services and ensure that we can meet their needs when providing these products and services as well as when providing them with the respective information.

In order to open a trading account with the Tifia Markets Limited you shall provide some personal information during registration. The reasons why this information is requested and how it is used by the Company as well as the means the Company utilizes to protect your information are described in this Privacy Policy. When you decide to use the brokerage services of Tifia Markets Limited, you shall be aware that hereby you give your consent to the use of your personal data in accordance with the rules described below.

Tifia Markets Limited guarantees to ensure complete security of the personal data requested to enable a trading activity in the Forex market. Tifia Markets Limited Privacy Policy is reviewed regularly to ensure that any new obligations and technologies, changes to our business operations and practices are taken into consideration, as well as that it remains abreast of the changing regulatory environment. Any personal information we hold will be governed by our most recent Privacy Policy.

The main reasons and purposes of collecting personal data in accordance with the legislation are described below:

**Contract obligations:** in order to on-board you as a Client, we have to request and verify your personal information according to our Client Agreement.

**Legal obligations:** Tifia Markets Limited is a subject to a number of various laws, which apply to financial organizations (e.g. anti-money laundering laws, financial services laws, corporation laws, privacy laws and tax laws). These laws and directives oblige the Company to collect and store personal data requested in their texts.

**Complaints' enquiries:** to perform an enquiry concerning your complaints, we may use the data you've provided upon enquiry.

**Data analysis:** we use various tools to gather behavioral and quantitative data about the users of our websites and subscribers to our emails in order to provide them with ultimate user experience and relevant content.

**Marketing purposes:** if you consent to receive our marketing communication materials, we will use the personal data you've provided to send you information about our products, services, and upcoming events.

Legal Notifications: we are obliged by the Law to advise you of changes to our products, services and/or agreements, therefore we may use your personal data.

If you want to exercise your rights, please contact us by email at [compliance@tifia.com](mailto:compliance@tifia.com) using the registered email address you disclosed to us. We try to respond to all requests within two weeks. Occasionally, it may take us longer than two weeks if your request is particularly complex or you have made a number of requests.

## 2. Collection of personal information

The Company guarantees that all data provided by you will be used exclusively for administrative, legal or other purposes related to provision of services.

In order to open an account with Tifia Markets Limited, you must first complete and submit a registration form by completing the required information. By completing this application form, you are requested to disclose personal information in order to enable the Company to provide you a services and comply with the relevant rules and regulations. This information may also be used by the Tifia Markets Limited to inform you regarding its services.

The information that we may collect from clients includes may include:

- full name, residential address and contact details (e.g., email address, telephone number, fax etc.);
- date of birth, place of birth, gender, citizenship;
- information about your income and wealth, including details about your and source of funds, assets and liabilities, bank account information, trading statements, FATCA and CRS information and financial statements;
- trading account balances, trading activity, your inquiries and our responses;
- information on whether you hold a prominent public function (PEPs);
- authentication data (e.g., signature)
- IP and location data;
- trading performance, knowledge and experience;
- verification information, which includes information necessary to verify your identity such as a passport or driver's license (examples also include background information we receive about you from public records or from other entities not affiliated with us); furthermore, we may collect other identifiable information such as identification numbers and/or Passport/Tax registration numbers;
- any other information customarily used to identify the client and allow Tifia Markets Limited to provide services.

Tifia Markets Limited obtains this information in a number of ways through your use of our services including through any of our websites, apps, the account opening applications, our demo sign up forms, webinar sign up forms, subscribing to news updates and from information provided in the

course of ongoing customer service communications. We may also collect this information about you from third parties such as through publicly available sources.

Tracking systems used on the Tifia Markets Limited websites and applications may collect your personal data automatically to optimize the services provided to clients/potential clients.

- Device used to access and use the Company's websites, we can provide you with the most appropriate version of our websites. The following types of data may be collected by Tifia Markets Limited websites and applications:
- Log information and logging certain behaviors on the site enables us to track user action and therefore troubleshoot any issues that may occur.
- Location information and IP address helps us localize our website content, which we provide to you based on your country, and improve your user experience on our websites and applications.
- Cookies help us improve the performance of our website(s) and our website visitors' experience, track your referrer and improve our future advertising campaigns.

Tifia Markets Limited also keeps a record of your trading behavior, including records regarding the following:

- products you trade with us and their performance;
- historical data about the trades and investments you have made including the amount invested;
- your preference for certain types of products and services.

Tifia Markets Limited may ask for other personal information voluntarily from time to time (for example, through market research or surveys).

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.

Tifia Markets Limited 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 business relationship with you. These recordings will be our sole property and will constitute evidence of the communications between us.

Your personal information will be stored, processed and protected as per personal information Protection Act under the jurisdiction of the country where the Tifia Markets Limited is registered.

In some cases, we can ask you to provide additional information required to improve services or in cases described in the governing documents of the Company.

## 4. Use of “cookie” files

Cookies are small portions of text information that web sites transfer to your web browser. The browser will store this information and send it back upon your request to the site. The use of “cookies” is required in order to expand your opportunities on the web site of the Tifia Markets Limited, for the adequate operation of all services, and for the access to some protected sections of the resource.

You can always deactivate the option of “cookies” on the Settings page of the Google Ads Preferences and on the page DoubleClick that disables “cookies” files. However, it is not recommended to deactivate this function as it ensures task-oriented and efficient use of the Company’s web site.

## 5. Use of personal information

Your personal information is used by the Company to ensure high level of service according to the requirements of the regulator and as per the legal provisions of International Policy AML/CFT. The requested data may be required to open and maintain activity of your account, to create its number and security password, to upgrade quality of service and provide you with relevant information about additional opportunities that may be interesting for you.

Tifia Markets Limited may process your personal information to send you marketing communications by email or phone or other agreed forms (including social media campaigns) to ensure that you are always kept up to date with our latest products and services. If we send you marketing communications, we will either do so based on your consent or if it is in our legitimate interest.

Tifia Markets Limited will not disclose your information to any outside parties for the purpose of allowing them to directly market to you.

Tifia Markets Limited may need to process your personal information for internal business and research purposes as well as for record keeping purposes. Such processing is in our own legitimate interests and is required to comply with our legal obligations. This may include any communications that we have with you in relation to the services and products we provide to you and our relationship with you. We will also keep records to ensure that you comply with your contractual obligations pursuant to the agreement governing our relationship with you.

Often the law requires us to advise you of certain changes to products or services or laws. We may need to inform you of changes to the terms or the features of our products or services. We need to process your personal information to send you these legal notifications. You will continue to receive this information from us even if you choose not to receive direct marketing information from us.

## 6. Update of personal information

You can change your personal information in the Client Area and request Tifia's specialists to change or delete your data by contacting the Company in writing using the most convenient way for you.

If any your registration data have been changed, you are obliged to notify immediately the Company's client support department of these changes and modify these data in your Client's Profile.

The Tifia Markets Limited is obliged to change or delete your personal information as instructed by you with the exception of the data which shall be kept in compliance with legal regulation that covers services that you requested, or to maintain adequate records.

## 7. Disclosure

The Tifia Markets Limited ensures safety of Clients' personal information. The Company shall not disclose any of its clients' confidential information to a third party, except: (a) to the extent that it is required to do so pursuant to any applicable laws, rules and/or regulations; (b) if there is a duty to the public to disclose; (c) if our legitimate business interests require disclosure; or (d) at your request or with your consent or to Persons described in this policy. The Company will endeavor to make such disclosures on a 'need-to-know' basis, unless otherwise instructed by a regulatory authority. Under such circumstances, the Company will notify the third party regarding the confidential nature of any such information.

If the Company discloses your personal information to business parties, such as card processing companies or banks, in order to perform the services requested by clients, such third parties may store your information in order to comply with their legal and other obligations.

The Company can transfer some of your personal data (name, country of residence, email, etc.) to affiliates, agents or other authorized organizations or individuals in order to fulfill all obligations relating to the services of the Company and only if the client expresses consent to participate in this activity. All service providers and specialized consultants engaged by the brokerage company Tifia Markets Limited are obliged to adhere to privacy policy, taking all necessary measures of protection. Please note that the use of your personal information by external third parties who act as data controllers of your personal information is not covered by this Privacy Policy and is not subject to our privacy standards and procedures.

The Company may disclose your personally identifiable information as required by rules and regulations and when the Company believes that disclosure is necessary to protect our rights and/or to comply with any proceedings, court order, legal process served or pursuant to governmental, intergovernmental or other regulatory bodies. The Company shall not be liable for misuse or loss of personal information or otherwise on the Company's website(s) that the Company does not have

access to or control over. The Company will not be liable for unlawful or unauthorized use of your personal information due to misuse or misplacement of your passwords, negligent or malicious intervention and/or otherwise by you or due to your acts or omissions or a person authorized by you (whether that authorization is permitted by the terms of our legal relationship with you or not).

## 8. Client's rights

You have the following rights in terms of your personal data Tifia Markets Limited holds about you:

- To know what sort of information about you the Tifia Markets Limited obtains;
- To receive the access to your personal data. This enables you to e.g. receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- To make changes in your personal data any time, or forbid spreading or use of this information, by sending a written request to the Tifia Markets Limited.
- To object where Tifia Markets Limited are processing your personal data, for direct marketing purposes. This also includes profiling since it is related to direct marketing. If you object to processing for direct marketing purposes, then we shall stop the processing of your personal data for such purposes.
- To ask for deletion or removing your personal information in certain circumstances such as if we no longer need it. Such request will be subject to any retention limits Tifia Markets Limited is required to comply with in accordance with applicable laws and regulations and subject to paragraph 9. If we have disclosed your personal information to others, we will let them know about the erasure where possible. If you ask us, where possible and lawful to do so, we will also inform you who we have shared your personal information with so that you can contact them directly.

## 9. Storage of your personal information

Safeguarding the privacy of your information is of utmost importance to us, whether you interact with us personally, by phone, by mail, over the internet or any other electronic medium. We will hold personal information, for as long as we have a business relationship with you, in a combination of secure computer storage facilities and paper-based files and other records and we take the necessary measures to protect the personal information we hold from misuse, loss, unauthorised access, modification or disclosure.

When Tifia Markets Limited considers that personal information is no longer necessary for the purpose for which it was collected, we will remove any details that will identify you or we will securely destroy the records. However, we may need to maintain records for a significant period of time. For example, we are subject to certain anti-money laundering laws which require us to retain the following, for a period of five (5) years after our business relationship with you has ended:

- a copy of the documents we used in order to comply with our customer due diligence obligations;

- supporting evidence and records of transactions with you and your relationship with us.

Also, the personal information we hold in the form of a recorded communication, by telephone, electronically, in person or otherwise, will be held in line with local regulatory requirements (i.e., 5 years after our business relationship with you has ended or longer if you have legitimate interests (such as handling a dispute with you). If you have opted out of receiving marketing communications, we will hold your details on our suppression list so that we know you do not want to receive these communications.

Tifia Markets Limited may keep your data for longer than 5 years if we cannot delete it for legal, regulatory or technical reasons.

The Company applies all appropriate technical and administrative measures necessary to protect the personal information that it collects and processes. The measures used are designed to provide a level of security appropriate to the risk of processing personal information. In particular, the Company:

- Stores personal data on secure servers.
- Uses encrypted transmission links in cases where it is both possible and necessary.
- Uses other safeguards: firewalls, authentication systems (e.g. passwords), and access control mechanisms to prevent unauthorized access to systems and data.
- Regularly reviews information collection, storage, and processing practices, including physical security measures, to guard against unauthorized access to systems.
- Restricts access to personal information to Company employees, contractors, and agents who need to know such information in order to process it, and who are subject to strict contractual confidentiality obligations.

## 10. Changes in this Privacy Policy

Our Privacy Policy may be reviewed to consider new laws and technologies, changes to our operations and practices, and to ensure that it remains appropriate to the changing environment. This changes will be added to this Privacy Policy. Current version always available on Tifia Markets Limited official website.