

Privacy policy

PRIVACY POLICY

Introduction

We, at SMARTEX INTERNATIONAL LTD. (the “ **Company**”, “ **us**” or “ **we**”), understand that you wish to keep your personal information private, and that you value our emphasis on keeping your information safe and discrete. We respect your privacy and are committed to protecting the privacy of our users (“ **user**” or “**you**”). This Privacy Policy outlines our practices with respect to collecting, using and disclosing your information through your use of our websites, applications and other online platforms we use to provide our services (collectively, “ **the Services**”).

This Privacy Policy is a part of our Service Agreement and is incorporated therein by references.

We encourage you to read the Privacy Policy carefully and use it to make informed decisions. By using our Services, you agree to the terms of this Privacy Policy and your continued use of the Services constitutes your ongoing agreement to this Privacy Policy including it’s updates.

In this Privacy Policy you will read about:

- **What type of information we collect**
- **Cookies**
- **How we use the information we collect**
- **With whom we share the information, and for what purpose**
- **Advertising**
- **For how long we retain the information we collect**
- **How do we safeguard your information**
- **Marketing**
- **How to contact us**

We collect two types of data and information from our users.

- The first type of information is individually identifiable information, namely information that identifies a Client or other individual, or may with reasonable effort identify an individual (“**Personal Information**”), which includes the following:
 - **Registration details:** When you open an account and register to our Services, you will be asked to provide certain information to us. The information we collect through the registration process includes your name; phone number; e-mail address; full address, password, information about your currency and other information that we may need in order to provide our Services.
 - **Identifying documents:** As a precondition for performing transactions through the Services, you may be asked to provide certain identifying documents required by the Company as well as other information we need in order to obtain from you a proof of identity, proof of residence and proof of funds. Such documents and information may contain Personal Information, such as identification numbers, passport, tax registration number, etc. We may also collect Personal Information in order to evaluate your trading experience and to make an assessment about your risk factor.
 - **Device data:** We may also collect Personal Information from your device, such as geolocation data, IP address, unique identifiers (e.g. MAC address and UUID) and other information which relates to your activity through the Services.
- The second type of information is un-identified and non-identifiable information pertaining to a user(s), which may be made available or gathered via your use of the Services (“**Non-personal Information**”). We are not aware of the identity of the user from which the Non-personal Information is being collected.
 - **Technical information:** In order to enhance the functionality of the Services and to provide you with a better user experience, we collect technical information transmitted by your device, including certain software and hardware information (e.g. the type of browser and operating system your device uses, language preference, access time and the domain name from which you linked to the Services; etc.).

- **Analytics information:** We collect information about your use of the Services, such as applications' usage, log files, user activity (e.g. pages viewed, the amount of time spent on particular pages, online browsing, clicks, actions, etc.), time stamps, alerts, etc. This information is collected for troubleshooting errors and bugs as well as for research and analytics purposes about your use of the Services.
- **Statistics:** We may collect and share with other traders Non-personal Information which may include your basic statistics, the percentage of correct predictions you make in your trading history, most profitable asset, the best streak you ever had, etc.
- **Anonymous information:** We may anonymize or de-identify the information collected by the Services or via other means so that the information cannot, on its own, personally identify you. Our use and disclosure of such aggregated or de-identified information is not subject to any restrictions under this Privacy Policy, and we may disclose it to others without limitation and for any purpose.

If we combine Personal Information with Non-personal Information, the combined information will be treated as Personal Information for as long as it remains combined.

Cookies and other tracking technologies

We and our **trusted partners** use cookies and other technologies in our related services, including when you visit our site or access our Services.

A "cookie" is a small piece of information that a website assigns to your device while you are viewing a website. Cookies are very helpful and can be used for various different purposes. These purposes include allowing you to navigate between pages efficiently, enable automatic activation of certain features, remembering your preferences and making the interaction between you and our Services quicker and easier. Cookies are also used to help ensure that the advertisements you see are relevant to you and your interests and to compile statistical data on your use of our Services.

Our website uses the following types of cookies:

- 'session cookies'** which are stored only temporarily during a browsing session in order to allow normal use of the system and are deleted from your device when the browser is closed;
- 'persistent cookies'** which are read only by our website, saved on your computer for a fixed period and are not deleted when the browser is closed.

Such cookies are used where we need to know who you are for repeat visits, for example to allow us to store your preferences for the next sign-in;

- c. **'third party cookies'** which are set by other online services who run content on the page you are viewing, for example by third party analytics companies who monitor and analyze our web access.

Cookies do not contain any information that personally identifies you, but Personal Information that we store about you may be linked, by us, to the information stored in and obtained from cookies. You may remove the cookies by following the instructions of your device preferences; however, if you choose to disable cookies, some features of our Service may not operate properly and your online experience may be limited.

We also use a tool called “Google Analytics” to collect information about your use of the Services. Google Analytics collects information such as how often users access the Services, what pages they visit when they do so, etc. We use the information we get from Google Analytics only to improve our Services. Google Analytics collects the IP address assigned to you on the date you visit sites, rather than your name or other identifying information. We do not combine the information collected through the use of Google Analytics with personally identifiable information. Google’s ability to use and share information collected by Google Analytics about your visits to this site is restricted by the [Google Analytics Terms of Use](#) and the [Google Privacy Policy](#).

How we use the information we collect

In addition to the purposes listed above, the information we collect, which may include your Personal Information, is used for the following purposes:

- To set up your account and to provide our Services to our users (e.g. to establish and set up your trading account; evaluate your trading experience; offer you structured products trading services; etc.).
- To identify and authenticate your access to the Services;
- To communicate with you and to keep you informed of our latest updates and services;
- To market our websites and products or those of any of **our business partners and marketing affiliates** (see below under “Marketing”);

- To serve you advertisements when you use our Services (see below under “Advertisements ”) ;
- To perform a research or to conduct anonymous analytics in order to improve and customize our Services to your needs and interests;
- To support and troubleshoot our Services and to respond to your queries;
- To investigate violations and enforce our policies, and as required by law, regulation or other governmental authority, or to comply with a subpoena or similar legal process or respond to a government request; and
- To monitor transactions for the purposes of preventing fraud, money laundering and cheating.
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With whom we share the information we collect

We do not rent, sell, or share your Personal and/or Corporate Information with third parties except as described in this Privacy Policy.

We may transfer or disclose Personal Information to our **subsidiaries**, and other **affiliated companies**. In addition, your Personal Information may be disclosed to other trusted **third party service providers** or **partners** for the purpose of: (i) authenticating your identity and verifying your account details; (ii) storing or processing Personal Information on our behalf (e.g. **cloud computing service providers**); (iii) assisting us with our business operations, providing our Services and improving it; (iv) performing research, technical diagnostics and analytics with regard to the Services; and (v) communicating promotional and informational materials, in accordance with our marketing policy (see below under “ **Marketing**”).

We may disclose Personal Information, or any information you submitted via the Services if we have a good faith belief that disclosure of such information is helpful or reasonably necessary to: (i) comply with any applicable law, regulation, legal process or governmental request; (ii) enforce our policies (including our Agreement), including investigations of potential violations thereof; (iii) investigate, detect, prevent, or take action regarding illegal activities or other wrongdoing, suspected fraud or security issues; (iv) to establish or exercise our rights to defend against legal claims; (v) prevent harm to the rights, property or safety of us, our users, yourself or any third party; or (vi) for the purpose of collaborating with law

enforcement agencies and/or in case we find it necessary in order to enforce intellectual property or other legal rights.

Third party collection of information

Our policy only addresses the use and disclosure of information we collect from you. To the extent that you disclose your information to other parties via our Services (e.g. by clicking on a link to other website or application) or via other sites or applications, different rules may apply to their use or disclosure of the information you disclose to them.

It is important to note that such third party services may have their own privacy policies and we advise you to read them carefully. Inclusion of a link to a third party website, application or service is not a recommendation of such a website or service. Third party sites may contain information or service that is illegal, unreasonable or that some people may find inappropriate or offensive. Before using third party sites, applications or services, we recommend you to read and understand those sites' and service' terms and conditions, warranty, and privacy policies and to ensure you agree to their terms. You acknowledge that we are not responsible for the products, services, or descriptions of those products or services that you receive from third party sites or applications or to the content or privacy practices of those sites, and that this Privacy Policy does not apply to any such third party products and services. You are knowingly and voluntarily assuming all risks of using third party sites or applications to purchase products and services. You agree that we shall have no liability whatsoever with respect to such third party sites, applications or services and your usage of them.

Advertisements

We may use advertising technology to serve advertisements (including targeted ads) when you use our Services. We may also use third parties and share with them Non-personal Information to assist us in evaluating the success of our advertising campaigns and help us retargeting our users.

You may opt-out of many third-party ad networks, including those operated by members of the Network Advertising Initiative (“**NAI**”) and the Digital Advertising Alliance (“**DAA**”). For more information regarding this practice by NAI members and DAA members, and your choices regarding having this information used by these companies, including how to opt-out of third-party ad networks operated by NAI and DAA members, please visit their respective websites:

www.networkadvertising.org/optout_nonppii.asp and www.aboutads.info/choices.

For how long we retain the information we collect?

We value your privacy and control over your Personal Information, and therefore you may, at any time, request to change and update it by emailing us at privacy@olymptrade.com. You can also request that we will correct errors or that we will erase your Personal Information (except for your transaction history and

other data that we are required to keep under applicable laws) by emailing us at privacy@olymptrade.com.

Please note that unless you instruct us otherwise we retain the information we collect for as long as needed to provide the Services and to comply with our legal obligations, resolve disputes and enforce our agreements.

We may rectify, replenish or remove incomplete or inaccurate information, at any time and at our own discretion.

How do we safeguard and transfer your information?

We take great care in implementing and maintaining the security of the Services we offer, and your information. We employ industry-standard procedures and policies to ensure the safety of our users' information, and prevent unauthorized use of any such information. Although we take all reasonable steps to safeguard information, we cannot be responsible for the acts of those who gain unauthorized access or abuse our Services, and we make no warranty, express, implied or otherwise, that we will prevent such access.

If you feel that your privacy was treated not in accordance with our policy, or if any person attempted to abuse our Services or acted in an inappropriate manner, please contact us directly at privacy@olymptrade.com.

Marketing

We may use your Personal Information, such as your name, email address, telephone number, etc. ourselves or **by using our third party subcontractors** for the purpose of providing you **with promotional materials, concerning our Services, as well as products, services, websites and applications** which relate to **our business partners and affiliates**; (collectively: "**Marketing Affiliates**"), which we believe may interest you.

We may also share and disclose Personal Information with our **Marketing Affiliates** for the purpose of providing you different marketing offers we or our **Marketing Affiliates** believe are relevant for you.

Out of respect to your right to privacy we provide you within such marketing materials with means to decline receiving further marketing offers from us or from our Marketing Affiliates. In addition, at any time, you may request to **unsubscribe and discontinue receiving marketing offers** by sending a blank message with the word "remove" to privacy@olymptrade.com.

If you unsubscribe we will remove your email address from our marketing distribution lists and from any future lists we may share with our Marketing Affiliates. However, you may need to separately unsubscribe from marketing offers sent by our Marketing Affiliates. Please note that even if you unsubscribe from our marketing mailing list, we may continue to send you service-related updates and notifications.

You hereby acknowledge and agree that by downloading, installing or accessing to our Services, we may share your Personal Information with our trusted partners and Marketing Affiliates for the purpose of direct marketing.

Corporate transaction

We may share Information, including Personal Information, in the event of a corporate transaction (e.g. sale of a substantial part of our business, merger, database migration, consolidation or asset sale of an asset or transfer in the operation thereof) of the Company. In the event of the above, the acquiring company or transferee will assume the rights and obligations as described in this Privacy Policy.

Updates or amendments to the Privacy Policy

We may revise this Privacy Policy from time to time, in our sole discretion, and the most current version will always be posted on the website. We encourage you to review this Privacy Policy regularly for any changes.

Registration and Authorisation

Information about the company:

SMARTEX INTERNATIONAL LTD.

Registered number: 1631 CTD 2017

Address: Suite 305, Griffith Corporate Centre, P.O. box 1510, Beachmont, Kingstown, St. Vincent and the Grenadines

How to contact us

If you have any general questions about the Services or the information that we collect about you and how we use it, please contact us at privacy@olymptrade.com