

PRIVACY POLICY

1. Our Commitment to You

We understand the importance of maintaining the confidentiality and privacy of Your Information. By entrusting us with Your Information, we would like to assure you of our commitment to keep such information private. We have taken measurable steps (see 9 below) to protect the confidentiality, security and integrity of Your Information.

2. Your Consent to Collection and Use of Information

Please note that when you access our Website we collect non-identifiable information in the following ways:

- Log Data
- Personal Information
- Cookies (including third party Cookies)

By using our Website and allowing Cookies on your browser which gives us access to certain information or manually submitting Your Information to us you consent to the collection and use of that information as set out in this Privacy Policy. If we change our Privacy Policy we will post the changes on this Website, so that you may be aware of the information we collect and how we use it at all times. Continued use of our Website will signify that you agree to any such changes.

3. Log Data

When you access our Website we collect information that your browser sends whenever you visit the Website or an online service (“Log Data”). This Log Data may include, but is not limited to, your computer’s Internet Protocol address, browser type, the web page you were visiting before you came to the Site and information you search for on the Site. In addition, if you access the Website via a mobile device, we may collect a PushID, subject to your consent as indicated by you in the mobile application, and a Mobile IP.

4. Personal Information

Based on the requirements of our regulated authorities in our efforts to maintain our Know-Your-Client procedures, we will require to verify clients’ trading accounts. The Company will need to obtain the following documents for verification purposes; proof of identification, proof of address and proof of transfer. The Company has the right to request additional documents

and information to carry out its due diligence where it deems fit.

5. Cookies

Cookies are small text files stored by your browser on your computer or device when you visit certain pages or perform certain actions on this and other websites. 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.

Some Cookies are only set for the duration of your visit (“session cookies”) to help you get around and give you 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, are anonymous, and unique to your browser.

We use cookies to help us find which services you are interested in and remember details about your application. We don't store sensitive information like your name or address in our cookies, just an anonymous reference to them so that we're able to find them. We also occasionally set Cookies to help you navigate around the site, enhance your experience, or give you important information regarding interests.

You can choose to disable or block these cookies in your browser but without some of them our site will not work. For more detailed information about cookies please visit www.allaboutcookies.org.

6. Cookies Settings

If you don't want to receive certain categories of Cookies our Website, you can opt-out of them. We will need to set a Cookie so that we can remember your choices when you next visit the website from the same browser. At the present time it is not technically possible for us to allow you to carry your settings with you between your browsers and devices so you will need to change these settings from each browser you use.

Please also be aware that we make every effort to respect your choices, however, there is the possibility that not all Cookies will be captured. If this is a concern, then we would recommend that you change your Cookie settings via your browser; your browser help function will tell you how.

Note: most of our Website may work without cookies, but you will lose some features and functionality if you choose to disable cookies.

7. Third Party Cookies

In order to give you the best possible experience, we partner with a number of Third parties to help us collect anonymous statistics about how our site is being used and provide you with further

information that may be of interest to you. As part of this process our Third party partners may set their own Cookies during your visit.

A “cookie” is a small text file that may be used, for example, to collect information about the User’s activity in relation to the Services and it may serve to recall Personal Information previously indicated by a User, such as his/her user ID and password for access to the Service(s). In particular, the Company’s technology providers might be using “Flash Cookies” and/or local storage technologies to help users access the Client’s accounts seamlessly and save their account settings to their browsers. Do note that most browsers allow controlling cookies, including whether or not to accept them and how to remove them.

8. How We Use Your Information

We use Your Information in order to (i) monitor and analyze use of the website and for the technical administration of the website, (ii) improve the website, (iii) generate and derive useful data and information concerning the interests, characteristics, use and behavior of our visitors.

Aggregate Information and Non-Identifying Information. We may share aggregated information, including queries and offers generated as a result of your use of the website, that includes non-identifying information and Log Data, with third parties for industry analysis, demographic profiling, other commercial purposes and to deliver targeted advertising about products and services. Any aggregated information shared in these contexts will not contain any personal information.

Compliance with Laws and Law Enforcement. We cooperate with government and law enforcement officials and private parties to enforce and comply with the law.

Business Transfers. We may sell, transfer or otherwise share some or all of our assets, including among others your Personal Information and Log Data, in connection with a merger, acquisition, reorganization or sale of all or substantially all of our shares or assets, or in the event of our bankruptcy.

In addition, we may post additional ancillary privacy notices with respect to specific services.

9. Duration of keeping Your Information

We will not keep Your Information for any longer than is required. In many cases, information must be kept for considerable periods of time. Retention periods will be determined taking into account the type of information that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable time.

10. Safeguard Measures

- 10.1** The Company takes reasonable precautions to protect Personal Information from loss, theft, misuse, unauthorized access or disclosure, alteration, or destruction.
- 10.2** The Company employ physical, electronic, and procedural safeguards to protect Personal Information and it does not store Personal Information for longer than necessary to provide the Service or as permitted by law.
- 10.3** The Company does not store or collect any Credit Card data.
- 10.4** All credit card information is stored on the payment provider side.
- 10.5** In accordance with the recommendations of Payment Card Industry Security Standards Council, customer card details are protected using Transport Layer encryption — TLS 1.2 and application layer with algorithm AES and key length 256 bit.
- 10.6** The Company's datacenter(s) contain both internal and external servers. Access to the Company's internal server is restricted to pre-approved persons, servers and locations; our external servers can be accessed via the Internet. Your Information is stored on secure servers and our servers can only ever be accessed by authorized personnel.
- 10.7** While we will use all reasonable efforts to safeguard Your Information, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data transferred from you, or to you via the internet.

11. Scope of the Policy and Third-Party Sites

This Policy applies only to us and this Website. We do not exercise control over other websites, or over banners or links from within our Website. These other websites, banners or links may place their own cookies or other files on your computer, collect data or solicit personal information from you subject to such third party's privacy policy. We encourage you to read the privacy policies and other terms of such third parties before accessing or using them.

12. Questions

If you have any questions regarding this policy, wish to access or change your information or have a complaint, or if you have any questions about security on our Website, you may email us at support@openxtm.com.

13. Update of this Policy

This Policy is subject to change without notice. For the reason, you are advised to look for updates from time to time.

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