



PRIVACY POLICY

SvoFX

SVOFX LTD.
Email: info@svofx.com

As part of our daily business operations, we need 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.

Our Privacy Policy is reviewed regularly to ensure that any new obligations and technologies, as well as any 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.

Please note that if you are an employee of the Company, a contractor to the Company or a third-party service provider, your personal information will be used in connection with your employment contract or your contractual relationship, whichever applies.

This Privacy Policy applies to the processing activities performed by SVOFX to the personal data of its clients and its potential clients, website visitors and employees. This Privacy Policy does not apply to websites operated by any other organisations or other third parties.

1. About the Proper Acquisition of Personal Information

In order to provide the service to our customers, we do obtain personal information under lawful and fair means, and do not obtain by deception or other wrongful means. In addition, an illegal act such as receiving an illegal acquisition of personal information from a third party while recognized it is a personal information that has been leaked. We obtain the personal information of customers in accordance with the following methods.

1. We obtain the information provided by the customers who input via the Internet or in writing.
2. We obtain the information provided by the customers who send to our email address.
3. We obtain the information provided by the customers who inquire us on phone.
4. We obtain the information provided by the customers who inquire us on phone and we had the voice recording.
5. We obtain the information provided by the customers who access to our web site and our log had the record.
6. We obtain the information provided by the customers who make a trade and our homepage possesses such as the transaction information.
7. Other proper way in accordance with laws and regulations compliance.

2. Lawful Basis for Processing Your Personal Information

We may process your personal data on the following bases and for the following purposes:

Performance of a contract

We process personal data in order to provide our services and products, as well as information regarding our products and services based on the contractual relationship with our clients (i.e.

so as to perform our contractual obligations). In addition, processing of personal data takes place to be able to complete our client on-boarding/acceptance procedures.

In view of the above, we need to verify your identity in order to accept you as our client and we will need to use those details in order to effectively manage your trading account with us. This may include third parties carrying out credit or identity checks on our behalf. The use of your personal information is necessary for us to know who you are as we have a legal obligation to comply with 'Know Your Customer' and customer due diligence' regulatory obligations.

Compliance with a legal obligation

There are a number of legal obligations imposed by relevant laws to which we are subject, as well as specific statutory requirements (e.g. anti-money laundering laws, financial services laws, corporation laws, privacy laws and tax laws). There are also various supervisory authorities whose laws and regulations apply to us. Such obligations and requirements impose on us necessary personal data processing activities for credit checks, identity verification, payment processing, compliance with court orders, tax law or other reporting obligations and anti-money laundering controls. These obligations apply at various times, including client on-boarding/acceptance, payments and systemic checks for risk management.

For the purposes of safeguarding legitimate interests

We process personal data so as to safeguard the legitimate interests pursued by us or by a third party. A legitimate interest is when we have a business or commercial reason to use your information. Despite that, it must not unfairly go against what is right and best for you.

Examples of such processing activities include the following:

initiating legal claims and preparing our defense in litigation procedures;

means and processes we undertake to provide for the Company's IT and system security,

preventing potential crime, asset security, admittance controls and anti-trespassing measures;

setting up CCTV systems (e.g. at our premises for security reasons);

measures to manage business and for further developing products and services;

sharing your personal data within the SVOFX for the purpose of updating/verifying your personal data in accordance with the relevant anti-money laundering compliance framework.

Risk management

You have provided your consent

Our storage and use of your personal data is based on your consent (other than for the reasons described or implied in this policy when your consent is not required). You may revoke consent at any time; however, any processing of personal data prior to the receipt of your revocation will not be affected.

To assess the appropriateness of our services/products for the Clients .

To provide you with products and services, or information about our products and services, and to review your ongoing needs.

Once you successfully open a trading account with us, or subscribe to an update or webinar, we will need to use your personal information to perform our services and comply with our obligations to you. It is also in our legitimate interests to try to ensure that we are providing the

best products and services so we may periodically review your needs based on our assessment of your personal information to try to ensure that you are getting the benefit of the best possible products and services from us.

To help us improve our products and services, including customer services, and develop and market new products and services.

We may, from time to time, use personal information provided by you through your use of the services and/or through client surveys to help us improve our products and services. It is in our legitimate interests to use your personal information in this way to try to ensure the highest standards when providing you with our products and services and to continue to be a market leader in the financial services industry.

To form a profile about you.

To investigate or settle enquiries or disputes.

We may need to use personal information collected from you to investigate issues or to settle disputes with you because it is in our legitimate interests to ensu.

3. Purpose of Use of Personal Information

We shall deal with the necessary minimum information within a necessary scope for achieving the purposes of use described below.

【Purpose of Use】

1. Financial derivatives transactions and the business associated.
2. Product provided by us or for you to use our services .
3. Our company or our subsidiaries, affiliates of the goods or for carrying out service guide.
4. To match the point of view of investor protection while making use of the above products and services.
5. For confirming it is the customer himself while making use of the above products and services.
6. In order to make the report, such as transaction details and account balance for customers.
7. For research and development of financial products and services according to market research as well as the practice of a data analysis and questionnaires.
8. Other such as properly and smoothly implement the trading with the customers.

4. What Personal Information Do we collect?

In order to open an account with us, you must first complete and submit an application form to us by completing the required information. By completing this application form, you are requested to disclose personal information in order to enable the Company to assess your application and comply with the relevant laws (including their regulations). The information you provide may also be used by the Company to inform you regarding its services.

1. Full name, residential address and contact details (e.g. email address, telephone number, fax etc.);
2. Date of birth, place of birth, gender, citizenship;

3. Information about your income and wealth, including details about your source of funds, assets and liabilities, bank account information, trading statements, FATCA and CRS information and financial statements;
4. Trading account balances, trading activity, your inquiries and our responses;
5. Information on whether you hold a prominent public function (PEP);
6. Profession and employment details;
7. Authentication data (e.g. signature);
8. Location data;
9. 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 you and about your trading experience which is relevant to us providing our services to you.

We obtain 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 your payment providers and through publicly available sources. We also keep records of your trading behaviour, 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.

We may ask you 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. 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 business 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.

5. Disclosure of Personal Information

The Company will not disclose any of its clients' confidential information to a third party, except:

1. To the extent that it is required to do so pursuant to any applicable laws, rules or regulations;

2. Our associates and service providers, for business purposes, including third parties such as business service providers and specialist advisers who have been contracted to provide us with administrative, financial, legal, tax, compliance, insurance, research or other services;
3. Business introducers with whom we have a mutual business relationship;
4. Business parties, credit providers, courts, tribunals and regulatory authorities as agreed or authorised by law;
5. Anyone authorised by you.

If the Company discloses your personal information to business parties, such as card or other payment 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.

Generally, we require that organisations outside the SVOFX Group who handle or obtain personal information to acknowledge the confidentiality of this information, undertake to respect any individual's right to privacy and comply with the all relevant data protection laws and this Privacy Policy. Third party service providers such as credit referencing agencies (if and when applicable) may keep a record of any searches performed on our behalf and may use the search details to assist other companies in performing their searches. 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.

Clients accept and consent that the Company may, from time to time, analyse the data collected while visiting our website(s) or by other means, such as questionnaires, for statistical purposes in order to improve the Company's business activities.

6.Storage of Personal information and Retention Period

Safeguarding the privacy of your information is of utmost important 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 we consider 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 (after you cease being our client). For example, we are subject to certain anti-money laundering laws which require us to retain the following, for a period of 7 years after our business relationship with you has ended:

1. A copy of the documents we used in order to comply with our customer due diligence obligations;
2. 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. 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.

7. Ensure the Accuracy

It is important to us that your personal information is up to date. We will endeavor to keep such personal data accurate and up-to-date within a necessary scope for achieving the purposes of use. We will take all reasonable steps to make sure that your personal information remains accurate, complete and up-to-date. If the personal information we hold about you is inaccurate or incomplete, you are entitled to have it rectified. If we have disclosed your personal information to others, we will let them know about the rectification where possible. If you ask us, if possible and lawful to do so, we will also inform you with whom we have shared your personal information so that you can contact them directly.

8. Safety Management Measures

In order to avoid unauthorized access to personal information, disclosure of personal information, loss or destroy, damage and tampering etc., we carry out reasonable prevention as well as corrective measures such as the maintenance of implementation system accordance with the safety management measures, maintenance of basic policies and handling regulations relating to safety management.

9. Continuous Improvement to Privacy Policy

Our Privacy Policy is reviewed regularly to ensure that any new obligations and technologies, as well as any 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. We will strive to improve to conduct an appropriate review of the personal information protection policy continuously.

10. Legal Disclaimer

The Company may disclose your personally identifiable information as required by rules and regulations and if the Company believes that disclosure is necessary to protect our rights or to comply with other proceedings, court order, legal process served or pursuant to governmental, intergovernmental or other regulatory bodies.

11. Disclosure of Billing Procedures

With respect to hold customers' personal data, we are committed to appropriately and promptly answer when there is a request of such as disclosure, correction, suspension of use from the customer after confirm it is the customer himself.

12. Handling in Other Countries

Your personal information may have been handled in other countries out of your home country. Therefore, we will comply with this Privacy Policy even if your own country doesn't provide the same protection and law.

How to contact us

If you have any enquiries regarding this Privacy Policy, please e-mail us at compliance@svofx.com.