

# Privacy policy

## 1. Introduction

1. We are committed to protecting and respecting your privacy. This Privacy Policy ("**Policy**") describes how we treat information that you provide to us or that we collect about you.
2. By personal data, we refer to data that may be used to identify you as a person. Personal data include your name, your address, your telephone number, your email address, your age, your gender, a part of your credit card number. Anonymous information, which we are not in a position to relate to you, does not qualify as personal data.
3. **Please read this Policy carefully. If you do not agree to this Privacy Policy, please do not attempt to use the Services. By registering an Account with StartFX and using our products and StartFX is legally obliged to collect and process your personal data which is required for the provision of the services.**

**By accepting this Policy, you signify your consent to the collection and other processing of your personal data in accordance with and for the purposes set out in this Policy**

## 2. Who we are

We ("StartFX", "we", "our" and "us") are:

Operated by LLC L.A. INVEST, a company incorporated in Georgia, registration no. 430034811, having its registration office and principal place of business address at Georgia, Tbilisi, Sandro Euli №3 licensed by the National Bank of Georgia ("NBG").

We respect your right to privacy and will only process personal data and other information you provide to us or we collect about you in accordance with applicable privacy and personal data protection laws.

## 3. Information we may collect from you

When you use our services we may collect the following data:

- Your first name and last name, your gender, date and place of birth, country of citizenship, residential address, e-mail address, telephone number,
- Client Login ID, financial background and prior trading experience required in order to carry out the appropriateness test as per the applicable regulatory framework
- Employment & source of funds information required to accept your funds deposits in accordance with AML legislation.
- A part of your credit card number, and information about your credit card issuer.
- Location information associated with your IP address when you visit our Sites
- Information relating to your use of our Services including, but not limited to, information about when and how you use the Services and data traffic
- Log files and statistics in relation to actions taken on our Sites
- Technical information about any device that you use when you visit the Sites such as your IP address and the browser you are using.

#### 4. How we use your information

We may use the information that you provide to us or that we collect about you for the following purposes:

1. Information may be collected and processed by us to provide you with the Services that you request from us and to perform the respective **Agreement** (e.g. Terms & Conditions) accepted by you. Data collected for that purpose will only be kept as long as necessary to provide the requested Services.
2. Compliance with applicable legislation and regulatory framework. Any data collected may be processed by us to detect, investigate and prevent activities that may be illegal, that may violate the Agreement and also to comply with the requests for information of the competent regulatory or lawful authorities. Such data will be kept for a minimum duration of 6 years after the Account closure in accordance with the current applicable laws.
3. Creation of additional promotion and advertising:
  - We may use the e-mail address and/or phone number that you registered with us via contact forms at our web sites, to provide you with information about our products, services and promotions, if you agreed to receive this kind of information while registering with us. You may also opt-out from use of your e-mail address for this purpose at any time, by sending an e-mail from the e-mail that was registered with us to [support@startfx.com](mailto:support@startfx.com) stating that you do not wish to receive such information.

#### 5. Sharing your information

We will not share your personal data with anyone else unless in the following limited circumstances:

- By your request or consent.
- To the extent that we are required to do so by applicable law, by a governmental/regulatory body or by a law enforcement agency, or for crime prevention purposes.

#### 6. Security

StartFX has implemented all reasonable technical, administrative and physical security measures to protect the security of your personal information and all client data including the placing of financial transactions and/ or orders. The whole network communication in the context of sharing financial and/ or personal information is protected by the use of a password.

All received information that the client provides is stored on secure servers and only authorized staff have access to this information. We take reasonable precautions to prevent the loss, misuse or alteration of your personal information. Our employees, contractors and agents may be given access to your personal information which we collect, but their use shall be limited to the performance of their duties in relation to facilitating your use of the Services. Our employees, contractors and agents who have access to your personal information are required to keep that information confidential and are not permitted to use it for any purposes other than those listed above or to deal with requests which you submit to us.

## 7. Your rights

You may ask us to update and correct any out-of-date or incorrect personal information that we hold about you.

If you wish to exercise this right, then please contact us at [support@startfx.com](mailto:support@startfx.com)

Please note that if you request the erasure of your personal information:

- We may retain and use your personal information to the extent necessary to comply with our legal obligations. Please note that we are legally obliged to keep on record all and any information, which is necessary to fulfill our obligations under the applicable laws for a period of up to 6 years after account closure.

## 8. Changes to this Policy

We may change this Policy from time to time for various reasons such as changes to reflect in law and regulation, changes in industry practices and technological developments. The latest version of this Policy will always be available on the Sites. Any new version of this Policy shall take effect the moment they are uploaded to our Sites.

## 9. Enquiries

If you have any enquiries about this Policy, or any questions about the use of your personal information, please e-mail us ([support@startfx.com](mailto:support@startfx.com)).