



## PRIVACY POLICY

At Charlgate Limited, we are committed to maintaining the highest standards of integrity. In the course of our business, it is necessary to collect Personal Information about our potential clients. We take this activity seriously and seek to provide fair, secure and appropriate methods for the handling of Personal Information. All such activities are intended to be consistent with both generally accepted privacy ethics and standard business practices. Your Personal Information may be shared with a limited number of trusted partners and/or affiliates of the Company where such use is restricted to the management of your account and will not breach any elements of the EU General Data Protection Regulation (GDPR).

If you have any questions or comments about the Company's Privacy Policy, you can contact our Customer Support Team at [support@icmtrader.eu](mailto:support@icmtrader.eu) or the Data Protection Officer at [dpo@icmtrader.eu](mailto:dpo@icmtrader.eu).

### Personally Identifiable Information

The Company shall process your personal data as a Data Processor when you specifically opt-in and provide us with your consent, during your application to open an account with us. The Company has a lawful base for processing your data, and it is for the following reason; 'processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into the contract.'

If you open an account with us, you will be asked for information regarding your name and address, employment and income, among other details. As part of the Money Laundering Applicable Laws in Cyprus and the Company's regulatory requirements with the Cyprus Securities and Exchange Commission (hereinafter, the "CySEC"), we are required to establish proof of your identity and address during the on-boarding stage. This process is conducted mainly by the Company by requesting, and processing copies of your personal identifiable information, but also involves the use of third parties who conduct electronic verifications on our behalf. You might be asked to supply additional information to support any additional verification measures that may apply.

Where stated we may use the personal information you provide to contact you in the future about our products and services. We only hold data which is necessary to offer the services provided on our website.

### Third Party Sites



This website contains links to other websites. Please note that the Company cannot be held responsible for the privacy policies of other websites. We encourage all visitors to be aware and read the privacy statements of every website that collects personally identifiable information. The Company can confirm that it has a strict policy of not sharing your Personal Identifiable Information with an unauthorized third party under any circumstances.

### **Privacy Statement Changes**

The Company may change this privacy statement at any time. If a change does occur, you will be notified accordingly, and where applicable your consent would be required. You are advised to read the statements so that you are satisfied with the privacy conditions under which you provide the Company with your personal information.

### **EU General Data Protection Regulation (GDPR)**

The Company as a Data Processor is bound to comply with the requirements and principles of GDPR in processing your personal identifiable information. The Company is registered with the Commissioner of Data Protection in Cyprus, an independent authority set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals.

### **Retention of Records**

We will keep Personal Information only as long as it is necessary and required to do so subject to CySEC regulation, including for the purposes of updating the product or services or as required by law. The retention period of your personal identifiable information is for a minimum of 5 years. You have a right to request to erase your information; however this is subject to the 5 year retention period mentioned above.

When the Personal Information is no longer required, it will be destroyed either by shredding or other approved destruction methods to prevent unauthorized parties from gaining access to the information during and after the process.

### **Your Rights**

The GDPR provides the following rights for individuals:

1. The right to be informed



2. The right of access
3. The right to rectification
4. The right to erasure
5. The right to restrict processing
6. The right to data portability
7. The right to object
8. Rights in relation to automated decision making and profiling.

For further details on each of your rights, please visit the link [here](#).

### **We will safeguard information in our custody**

We have developed and will maintain security procedures to safeguard Personal Information against loss, theft, copying, and unauthorised disclosure, use or modification. Access to Personal Information is restricted to employees and authorised service providers who need it to perform their work.

### **Right to Withdraw Consent**

You have the right to withdraw your consent at any time, subject to meeting one of the following conditions:

1. Your personal identifiable information to which has been processed by the Company has surpassed the 5-year retention period;
2. You do not have an open account; or
3. You failed to open an account (for example due to being refused during the application stage).

If you meet one of the above conditions, you may contact us at any time and withdraw your consent.



## **What are Cookies?**

Cookies are small data files. When you visit a website, the website sends the cookie to your computer. Your computer stores it in a file located inside your web browser.

Cookies do not transfer viruses or malware to your computer. Because the data in a cookie does not change when it travels back and forth, it has no way to affect how your computer runs, but they act more like logs (i.e. they record user activity and remember stateful information) and they get updated every time you visit a website.

We may obtain information about you by accessing cookies, sent by our website. Different types of cookies keep track of different activities. For example, session cookies are used only when a person is actively navigating a website. Once you leave the website, the session cookie disappears. For a more detailed list of cookies we use, please read the relevant section below.

## **How we use Cookies?**

Also known as browser cookies or tracking cookies, cookies are small, often encrypted text files, located in browser directories. They are used by web developers to help users navigate their websites efficiently and perform certain functions. Due to their core role of enhancing/enabling usability or site processes, [disabling cookies](#) may prevent users from using certain websites.

Cookies are created when a user's browser loads a particular website. The website sends information to the browser which then creates a text file. Every time the user goes back to the same website, the browser retrieves and sends this file to the website's server. Computer Cookies are created not just by the website the user is browsing but also by other websites that run ads, widgets, or other elements on the page being loaded. These cookies regulate how the ads appear or how the widgets and other elements function on the page.

## **Functional and non-functional cookies**

We use functional cookies to analyse how visitors use our website, as well as track and improve our website's performance and function. This allows us to provide a high-quality customer experience by quickly identifying and fixing any issues that may arise. For example, we might use cookies to keep track of which website pages are most popular and which method of linking be-



tween website pages is most effective. The latter also helps us to track if you were referred to us by another website and improve our future advertising campaigns.

Another use of cookies is to store your log in sessions, meaning that when you log in to the Members Area to deposit funds, a "session cookie" is set so that the website remembers that you have already logged in. If the website did not set this cookie, you will be asked for your login and password on each new page as you progress through the funding process.

In addition, functional cookies, for example, are used to allow us to remember your preferences and identify you as a user, ensure your information is secure and operate more reliably and efficiently. For example, cookies save you the trouble of typing in your username every time you access our trading platform, and recall your preferences, such as which language you wish to see when you log in. See some examples of the function enabled through the use of cookies:

- Detecting the country you are currently visiting from
- Checking browser type and device
- Tracking which site the user was referred from

Allowing third parties to customize content accordingly

Our cookies do not contain any personal data, account numbers, or passwords. We may enlist outside organizations to help us manage the website and collect and analyze statistical data. These outside organizations may install and use their own cookies on our behalf.

Functional cookies have uses including:

- remembering your login details
- guaranteeing the security of your login details
- guaranteeing the uniformity of the appearance of the website

Non-functional (analysis) cookies have uses including:

- counting the numbers of visitors to the website
- recording how visitors use the website
- improving the performance of the website
- improving your user experience on the website

There are functional and non-functional cookies. Functional cookies are needed for the website to work properly or to make sure that the desired information is shown quickly and accurately each time you visit our website. For example, you do not have to enter your details, mention your preferences or change your settings again upon your next visit. Non-functional cookies tell us about the number of visitors to the website and how these visitors use the site. We can use this information to improve the website. These files automatically disappear as soon as you close your internet browser or stay saved on your computer for up to 12 months after your last visit.



## Use of Web Beacons

Some of our Web pages may contain electronic images known as Web beacons (sometimes known as clear gifs) that allow us to count users who have visited these pages. Web beacons collect only limited information which including a cookie number, time and date of a page view, and a description of the page on which the Web beacon resides. We may also carry web beacons placed by third party advertisers. These beacons do not carry any personally identifiable information and are only used to track the effectiveness of a particular campaign.

## Disabling/Enabling Cookies

You have the ability to accept or decline cookies by modifying the settings in your browser. However, you may not be able to use all the interactive features of our site if cookies are disabled.

For further information about cookies and how to disable them, please refer to [www.allaboutcookies.org](http://www.allaboutcookies.org).

## List of cookies

The table below is a non-exhaustive list of cookies used by our website. This website also works together with a number of third parties who also save cookies on your PC through our website to allow proper use of the services they offer. If you want more information about the cookies from these suppliers, or information about how you can refuse them, we recommend you see the individual privacy policies of these parties.

## Data Protection Officer

If you are not satisfied with our response or believe we are not processing your personal data in accordance with the law, you can escalate your complaint to the data protection regulator in your jurisdiction. The Office of the Commissioner for Personal Data Protection can be contacted at 1 Iasonos str., 1082 Nicosia. Further information is available on the Office of the Commissioner for Personal Data Protection's website at <http://www.dataprotection.gov.cy>.

**By accessing the Charlgate Ltd website and any pages linked thereto, I agree to be bound by the terms and conditions as described above.**