



**GLOFFIX**  
GLOBALLY YOURS

# Account Terms

## PRIVACY POLICY



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Gloffix is responsible for the protection of privacy and the safeguarding of clients' personal and financial information. By opening a trading account with the Company, the client hereby gives its consent to such collection, processing, storage and use of personal information by the company as explained below.

### COLLECTION OF PERSONAL INFORMATION

While opening a trading account, personal data of the clients are collected by the Company. It is necessary to perform financial transactions, protect the assets and confidentiality of data, and the possibility of providing quality services as well. When a client registers on the Company's website, he must fill in the form, which specifies personal information of the following nature:

1. contact information that will allow to quickly establish communication with the client (name, e-mail, mobile phone);
2. information confirming the identity of the client. Such information can include a passport and identification code. In some cases, the Company may require a notarized translation of these documents into English. If the client plans to replenish the account and withdraw funds using a bank card, he needs to provide data from the front of the plastic card, namely the first 6 and the last 4 digits of the card number, the name of the cardholder and the validity period of the card. The client takes responsibility for the reliability, accuracy, and relevance of any personal information. Also, the client is obliged to notify the Company about changes in any kind of provided information. In such a way, it is possible to prevent fraud and enforce anti-money laundering rules;
3. to protect client funds, it is necessary to provide information on the activity of the client's account;
4. in order to use the terminal as comfortably as possible, the Company may request indirect customer data such as the client's IP address, a browser type, the name of the Internet provider, etc.

A company can request personal information from a client in several ways:

1. through the official website or in the mobile application;
2. during the registration of a trade or demo account;
3. while submitting an application for participation in promos;
4. while subscribing to the newsletter;
5. while contacting technical support;
6. the company can also take information about the client from a third party, for example, in public sources, from payment providers, during marketing activities (research, surveys).

The company can record and save any form of communication with the client (e-mail correspondence, phone call, etc.), which took place in the context of business relations. Such a record can be considered to be proof of mutual cooperation between the client and the Company. During telephone recording, there is no warning signal or any other notifications.

By collecting information about its customers, the Company pursues several goals simultaneously:

1. Observes legal formalities. Gloffix is a law-abiding company that keeps within anti-money laundering laws, financial services, and confidentiality, and also complies with corporate and tax laws. The various supervisory authorities strictly follow that the Company strictly keeps within the laws, which means that it is obliged to process personal information of customers for credit checks, identity verification, processing of financial transactions, satisfy the judgment, articles of the tax code, and other reporting obligations and control over money laundering;
2. Protects own interests. The company is interested in using the personal information of clients for commercial and non-commercial purposes, such as drawing up legal claims, preparing a defense in court, managing business and subsequent development of services and products;
3. Acts with the permission of the client. The Customer voluntarily allows the Company to use and store information about himself, and he has the right to withdraw his consent at any time. Until the client's withdrawal, the Company has the right to store and process customer's information;
4. Assesses the quality and feasibility of services and product range offered to customers; communicates information about them and analyzes the current needs of customers;

5. Seeks to improve the quality of products and services, including customer service, development, and introduction of new services and products;
6. Investigates and resolves disputes;
7. Keeps within the applicable laws, judicial orders, processes, and requirements of regulators;
8. Send polls. Answering questions in such pools, the client thereby helps to improve the quality of service and interacts with the Company. Responses to polls are processed and depersonalized;
9. Analyzes information. The web beacons and tags contained on the official resource or in the e-mail-list help to analyze the information about the correspondence received by the client, the number of users of the official site, etc.;
10. Pursues marketing goals. The company uses the personal information of its customers for the distribution of marketing messages via e-mail or telephone calls. If the client does not want to receive such kind of information, he can send a refusal to the e-mail address [support@gloffix.com](mailto:support@gloffix.com); or the client can refuse from such a mailing by clicking on the link for exclusion from the mailing list on any advertising mail of the company;
11. Maintains internal records that are necessary to comply with the Company's legal obligations and for its personal interests;
12. Notifies customers about all changes in the services provided, product range, or legislation. To send such a message, it is necessary to process personal information;
13. If the Company is restructured or the owner has changed, personal information about its customers can be provided for verification, as required by the legal agreement.

## RIGHTS OF CLIENTS IN RELATION TO PERSONAL INFORMATION

A client who provides personal information to the Company has the following rights:

1. have access to personal information upon the first request;
2. make changes in the information about yourself on the request sent to the Company;
3. request to delete information about yourself. In some cases, if the law allows or requires, the Company may refuse to delete the information; the client will be informed additionally;

4. if the client sees any signs of impairment of rights and freedoms in the system of using personal data, he may refuse from processing information about himself directed at direct marketing; in this case, all or a number of services may not be available to the client;
5. request the suspension of data processing to establish their veracity, appropriateness, and legality of their application, or due to an objection to their use;
6. send a request for the transfer of personal information to third parties. The company provides it in a structured form, but only in the electronic version;
7. withdraw consent to the processing of personal information at any time at the wish of the client.

Any of the above requests can be sent to the technical support e-mail [support@gloffix.com](mailto:support@gloffix.com). The company responds to letters of similar content for several calendar days, if more time is needed to resolve the issue, the client will be notified about it additionally.

#### THE TERM OF USE OF PERSONAL DATA

The Company protects the confidentiality of the personal data of its customers, regardless of how these data were received:

1. data were provided by the client in person;
2. data were received through e-mail;
3. through the Internet;
4. provided on any digital media.

During the whole period while there are business relations between the Company and the client, the client's personal information is preserved. The company undertakes to ensure the safety of digital storages, paper files, and other records all this time. The Company takes all necessary measures to protect the personal information it possesses from illegal and unauthorized use, loss, editing, disclosure, or theft.

If the Company has achieved all the goals with respect to the client and no longer needs his personal information, it deletes the information and does not identify the

person as the customer. There are times when, even after the termination of the joint venture, the Company keeps a record of customer data. Such a thing happens when the client's actions are treated as money laundering or fraud. In these cases, the law requires the Company to store information about the client for at least 5 years, even after the termination of cooperation with him.

Personal information and data on ongoing transactions are retained for longer than 5 years from the moment of suspension of the cooperation agreement with the client in cases where the law and regulatory documents require it. For example, during court proceedings and disputes with the Company. When a client submits a request to refuse from receiving marketing research, information about it is saved in the list of suppression. It gives the Company the opportunity to comprehend that the client does not want to receive such kind of messages.

In accordance with legal, regulatory and technical reasons, the Company has the right to store personal information about the customer for more than 5 years.

## PROTECTION OF PERSONAL DATA

The personal information provided by the Company's client is confidential and can be distributed only within the Company or among its affiliated persons. Information is not subject to disclosure to a third party, except for situations provided by law. If a court or regulatory authority requests information about the client, its providing will be made according to the principle of official necessity, while the third party will be informed of the confidentiality of the information received.

To ensure the security of the personal data of the client and the user of the official resource of the Company, rules, and technical methods aimed at protecting information were developed and implemented as well. Any operation carried out by the client within the official site is completely safe. To protect the website, a server certificate is used to confirm the reliability of the Company, in addition, a cryptographic cipher is used during the transfer of data - Secure Sockets Layer (SSL).

The login to the personal account is carried out using a username and password. These data are the property of the client; therefore, the Company is not responsible for the way it uses this information and how the customer manages accounts with their help. If the customer has detected unauthorized use of his trading account or noticed suspicious activity, it is mandatory to report to the technical service of the Company.

## AFFILIATES AND PARTNERS

The Company may share information with affiliates in the event such information is reasonably required by such affiliate in order to provide the products or services to its clients. The Company may share information with partners, affiliates, and associates in order to offer additional similar products and services that meet clients' needs and which are delivered in a manner that is useful and relevant only where clients have authorized the Company to do so.

## UNAFFILIATED THIRD PARTIES

The company does not sell, license, or lease personal information to a third party, except cases that comply with the privacy policy. The company has the right to disclose personal information of customers in cases where it is requested by legislation, regulatory and other documents of government agencies. Disclosing personal information of customers is allowed to such categories of third parties:

1. Gloffix partners providing financial and other services;
2. developers of programs that create communication systems, applications, and trading terminals used by customers in the future;
3. service providers and consultants on the basis of a contract for the providing of administrative, information, analytical, financial, marketing, and other services;
4. brokerage companies and their branches, which cooperate with the Company;
5. providers of payment services and banking institutions for the processing of financial transactions of customers;

6. auditors and contractors who conduct an audit, provide assistance and consult on various business affairs;
7. courts, tribunals, and regulators;
8. state and law enforcement agencies in accordance with the current legislation and various legal and regulatory acts;
9. any organization for which personal information about the customer is necessary in order to provide him with a quality service;
10. any person who has been authorized by the client.

The third-party receives only minimal access to personal information, its volume is sufficient only to secure contractual obligations to the Company. A third-party supplier has no right to disclose and use information about the customer for purposes that are not discussed with the Company. The third-party, which obtains access to the personal information of the Company's clients, is obliged to protect it in accordance with the relevant legislation, using the same methods as the Company uses.

The company will not provide personal information about the client to a third party if the Company is not sure of the proper level of security and protection of such information.

## REGULATORY DISCLOSURE

The Company reserves the right to disclose personal information to third parties where required by law, regulatory, law enforcement, or other government authority of competent jurisdiction in order to protect our rights and/or to comply with such legal proceedings. Such disclosure shall occur on a 'need-to-know' basis unless otherwise instructed by a regulatory or other government authority. Under such circumstances, the Company shall expressly inform the third party regarding the confidential nature of the information.

## CONTACT CLIENTS

From time to time the Company may contact clients whether by phone or email for the purpose of offering them further information about the Company or financial

market trading. In addition, the Company may on occasion, seek to contact clients, whether by phone or by email, for the purpose of informing them of unique promotional offerings provided by the Company for the client. Clients consent to the receipt of such contact when they consent to our terms and conditions of use when registering with the Company. Any person wishing to opt-out of further contact with the Company at any time whatsoever is entitled to do so, simply by contacting the Company whether by phone or email and requesting that no further contact on behalf of the Company be made.

## RESTRICTION OF RESPONSIBILITY

The Company is not responsible for the privacy policies or the content of sites to which Gloffix links and has no control over the use or protection of information provided by the clients or collected by those sites. Whenever a client elects to link to a co-branded web site or to a linked web site, the client may be asked to provide registration or other personal information. Please note that such information is recorded by a third party and will be governed by the privacy policy of that third party.

## USE OF COOKIES

To protect the trading operations of customers and improve the efficiency of the official Gloffix Global LTD's website, the Company uses cookies. Cookies do not contain personal or confidential information; cookies are small text fragments sent by the Company from their Internet resource to the client browser. Cookies are stored in the client's browser and allow the Company to recognize each client using a unique identifier.

When visiting the official website of the Company, several cookies may be placed in the client's browser for the following purposes:

1. to turn on some options on the site;
2. to conduct analytical activities;
3. to remember customer preferences;

4. to ensure the delivery of promotional products, including remarketing

Since cookies can perform various functions, they are usually classified as follows:

1. Basic. These ones are intended for authentication of clients and for the purpose of the prevention of fraudulent actions with the account;
2. Strictly necessary. These provide the movement on the site, use of certain options, access to protected and registered areas;
3. Productive. These cookies collect information about how the clients have been using the site, where they go, what they are interested in. This information can reduce the overall load on the internal infrastructure, track the totality of the use of the Company's website and generally improve the service through experiments with its new functions;
4. Functional cookies remember the principle of logging in even after editing the information. They adapt the website and help to expand the functionality for customers.

Cookies can be used by third-party partners of the Company to provide promotional materials that could be of interest to the client. By their means, the activity of users on other sites or services is monitored. The data collected in this way is passed on to advertisers and advertising networks in order to subsequently deliver advertising and evaluate its effectiveness.

There are 2 types of cookies: session and permanent cookies. The first option is stored on the client's computer until the page view of the Company's website is completed. The second one is stored on the computer device until it is completely deleted or before its expiry.

In addition to its own cookies, the company has the right to place cookie files of third-party partners. It is done to report statistics, provide promotional materials on the resource and through the site.

It should be remembered that deleting some cookies can lead to inaccessibility to some functions on the site, in the personal account, or in the trading terminal. Moreover, some pages may not be displayed correctly.

## PRIVACY POLICY UPDATES

The Company may update this Privacy Policy from time to time. In the event that the Company materially changes this Policy including how it collects, processes, or uses clients' personal information, the revised Privacy Policy will be uploaded in the Gloffix. In this respect, the clients hereby agree to accept the posting of a revised Privacy Policy electronically on the website as the actual notice of the Company to its clients. Any dispute over the Company's Privacy Policy is subject to this notice and the Client Agreement. The Company encourages its clients to periodically review this Privacy Policy so that they are always aware of what information the Company collects, how it uses it and to whom it may disclose it, in accordance with the provisions of this Policy.

## KYC POLICY

Know your customer policies have become increasingly important worldwide lately, especially among banks, and other financial institutions, in order to prevent identity theft, money laundering, financial fraud and terrorist activity.

Gloffix holds a zero-tolerance fraud policy and is taking all measures possible to prevent it. Any fraudulent activity will be documented and all related accounts to it will be immediately closed. All funds in these accounts will be forfeited.

### Prevention:

- Gloffix aims to ensure the integrity of any sensitive data it obtains, such as your account information and the transactions you make, using a variety of security measures and fraud controls. Securing your electronic transactions requires us to be provided with certain data from you, including your preferred deposit method.

To deposit and withdraw funds from your account, the client should provide the required information and documentation.

List of the required documents:

1. **Proof of ID (identity):** ID or Driver's license. Provide us with both sides of ID.
2. **Proof of residence:** Bank/credit card statement or utility bill – Electricity/ Gas/Water bills, landline phone (the document should include your full name and shouldn't be older than 3 months. Bank statement or residence certificate shouldn't be older than 6 months.  
Please **NOTE:** mobile phone or mobile internet bills are not acceptable, bills from shops/service centers/car insurance also can't be accepted.
3. **Copy of payment card:** Credit/debit card copies of both sides which were used for the deposit. The next information must be visible:
  1. Front side: the last 4 digits' / expiry date/ card holder name.
  2. Back side: the last 4 digits (please cover CVV code).

In case, that you deposit was made with unnamed card), you should provide us with the following document proving that you are the cardholder:

3. credit card statement containing your full name and the last 4 digits of the credit card or
4. screenshot from your personal account of your banking containing your full name, last 4 digits of your credit card, and URL (www.ibank.com) of the online banking.
4. **Declaration of deposit (see attached).**  
You may upload documents in your personal account on the website or send to: support.int@gloffix.com

**IMPORTANT:** All documents should be in a good quality, colored, readable, full-sized.

## DEPOSIT AND WITHDRAW POLICY

To conduct any financial activity related to potential profit, Gloffix customers must deposit funds to a real account. The withdrawal procedure may be processed with a real account only.

## Deposit methods

The most common ways to Fund your Gloffix account are:

1. Bank transfer
2. Credit card
3. E-wallet

Before funding their account, the client should go through the document verification process, which will prove the fact of ownership. This procedure avoids the involvement of a third party and the imposition of additional penalties.

When replenishing an account using a credit card, it is required to provide a photo of the card from both sides to ensure that it is the client who owns the card (only the main 16 digits of the card are required). In case of refusal to provide such data, the deposit may be rejected.

Please note that when replenishing your account, the total amount may differ from the amount credited, this happens due to fees of payment systems or banks when transferring funds. In turn, Gloffix does not collect any commissions from users. Please, find out more about the commission on the deposit/withdraw page.

## Withdrawals

According to the basic rules and regulations of AML, the user must request a withdrawal of funds through the same bank account or credit/debit card or payment system account and the same account that was used on deposit.

Please note that using other payment information when withdrawing funds, the client may be subject to additional commission or meet certain restrictions.

In accordance with anti-money laundering rules. Gloffix may execute withdrawal orders to a different facility than the one used for the deposit.

Other documents or requirements may be presented to the user during withdrawal processing.

## Non-Deposited Funds

Funds that are credited to the Client's account may include amounts not directly deposited by the Client (agreed or voluntary bonuses or any other amounts received for activities that do not apply to deposited funds), this category of funds is called "Non-Deposited Funds".

Gloffix may provide bonuses or other types of assets that can be used in accordance with the Client Agreement. All bonus funds are fully owned by the Gloffix broker, are considered non-deposit (credited) funds and can be canceled at any time.

If the origin of your funds or activities in general would violate the regulations provided by the AML committee. The company reserves the right to cancel or prohibit any transactions (withdrawal or deposit) and freeze assets for refund.

If you have any questions or issues that are related to our services, feel free to contact our Customer Support.

## Additional Terms

Please note this policy cannot be exhaustive, and additional conditions or requirements may apply at any time due to regulations and policies, including those set-in order to prevent money laundering. Please note any and all usage of the site and services is subject to the Terms and Conditions, as may be amended from time to time by Gloffix, at its sole discretion.