



GFX INTERNATIONAL LIMITED

(Registered Number: 25580 BC 2019)

Registered in Saint Vincent and the Grenadines under license number 25580 BC 2019

PRIVACY POLICY

Introduction

GFX provide this Privacy Policy to inform users of our policies and procedures regarding the collection, use and disclosure of personally identifiable information received from users of this website.

GFX reserves the right to make changes at any time to the Site or the Privacy Policy. Any modifications to the Privacy Policy will be effective upon posting on the Site. Your continued use of the Site following posting of any revised Privacy Policy will constitute acceptance of the modified Privacy Policy. By providing us with such information, you are giving us your consent to collect, use and store the information in the manner explained below.

GFX takes the issue of data protection very seriously. The data protection and data security of persons using our Website are thus matters we consider to be very important. Accordingly, we hereby give an undertaking to protect your privacy and to treat your data in confidence. Third parties shall be advised of your personal data only when this is permitted by data protection laws, if a judicial or similar order for the release of data has been issued, or you have explicitly agreed to such forwarding of data.

What Information We Collect

Personally Identifiable Information - When you browse the non-password protected portions of our Site, you do so anonymously; no personally identifiable information is collected. When you sign up to become a registered user of GFX we request that you provide to us your email address, a username and a password to access our Site. You may also choose to supply trading information (e.g., how long you have been trading, your preferred trading style, etc.) and a profile description.

Personal ("person-linked") data is data that can be unambiguously assigned to a specific individual, and can thus be used to reveal personal or factual information about yourself.

Utilization of the GFX platform is subject to prior registration.

When you apply for or maintain a GFX Demo or Live account, we collect personal information about you for business purposes; to evaluate your financial needs, to process your requests and transactions, to inform you about products and services that may be of interest to you, and to provide client service. You may choose what you receive from us at any point by accessing the notification option in your account. Such information may include:

- Application Information - Information that you provide to us on applications and other forms: your name, address, birth date, social security number, occupation, assets, and income.
- Transaction Information - Information about your transactions with us or our affiliates, as well as information regarding our communications with you. Examples: your account balances, trading activity, your inquiries and our responses.

- Verification Information - Information necessary to verify your identity such as a passport or drivers license. Examples: background information about you we receive from public records or from other entities not affiliated with GFX.

Once you register with GFX and sign in to our Site, you are not anonymous to us. As a registered user, you may provide GFX with the credentials to access your brokerage account (i.e. user ID, password, information necessary to access your account). We will never access your accounts for any other purpose than to retrieve your trading data and provide the services as you have requested. You can de-activate your account for any reason at any time and we will delete all of your personally identifiable information from our servers. We will not keep a copy of your personally identifiable information for any purposes upon account deactivation except as may be required by law or to otherwise protect legal rights.

We also collect non-personally identifiable information when you perform certain activities such as when you post comments, ideas, suggestions, provide feedback or when you answer surveys. These non-personally identifiable information are considered non-confidential and we are free to disclose and use such data at any time, without needing to obtain permission from you.

Technical Information & Data Security

When you visit our Site, we may collect information through “cookies” or other similar Web tools to enhance the user experience. Cookies are small strings of text that are sent by our Site to your browser on your computer’s hard drive.

Cookies enable us to recognize you when you return to our Site, to maintain your Web session while you browse throughout the Site, as well as help us provide you with a better, more personalized experience. Our cookies are not tied to personally identifiable information. Most web browsers automatically accept cookies, but it is possible to change your browser setup so that it does not accept cookies. However, rejecting cookies may prevent you from taking advantage of certain portions of our Site.

In addition, when you are browsing our Site, GFX automatically receives and records information on our server logs from your browser including your IP address, GFX cookie information and the pages you request. We use this information to improve the functionality and usability of our services. Our log files are not tied to personally identifiable information.

We use secure server software (SSL) and firewalls to protect your information from unauthorized access, disclosure, alteration, or destruction.

How We Use The Information We Collect

We gather, store, process and use the personal data that we receive from you when you register as a user of our Website, and/or the data provided by you voluntarily in the course of your use of the GFX platform.

When you are selecting and accessing information available on the platform, our servers may - as a requirement for the provision of the service, or for security purposes - store data that could facilitate personal identification (e.g. IP address). Such data is, however, regularly deleted.

The purpose of the gathering, processing, storing and utilization of your personal data by GFX is for the operation and administration of the GFX platform. No person linked analysis of date is conducted. We do, however, reserve the right to conduct statistical evaluation of personal data held in pseudonymized or anonymized data records. Such evaluation is, for example, used in IP logs for system security reasons, to improve the Website, and for statistical purposes.

The information collected would be used to enhance your experience when using our services on our website. This may include:

1. Personalizing your experience on our site according to your individual needs and preferences.
2. Improving customer service – your information helps us respond to your requests and feedback more readily.
3. Processing transactions and performing requested services/ activities for you on our site.
4. Sending you periodic emails or updates concerning your orders and services.
5. Administrating a contest, competition, promotion, survey etc.

Customer Service - Based upon the personally identifiable information you provide us during the registration process, we will send you a welcoming email to verify your account. We will also communicate with you in response to your inquiries, to provide the services you request, and to manage your account.

Brokerage Information - As a registered user of our Site, you may provide to us the credentials to access your brokerage account to retrieve your trading data. This information is only used to obtain trading history for your account and this information and is not accessible anywhere on our Site.

We Do Not Reveal Any Personally Identifiable Information - We will not publish any personally identifiable information (e.g. name, email address or contact information) on our Site for others to view, without your permission, unless you choose to post it yourself on the Site.

We Do Not Rent or Share Any Personally Identifiable Information - GFX does not rent or share any personally identifiable information with third parties that are not our agents or service providers.

We May Provide Your Information If Legally Required to do so - GFX may be required to provide your information under the following circumstances: in response to court orders or requests by appropriate authorities, or to establish or exercise our legal rights or defend

against actual or threatened legal claims. In addition when we believe it is necessary to share information in order to investigate, prevent, or take action regarding illegal activities or activities which we believe give rise to legal liability to us, our members or third parties, suspected fraud, situations involving potential threats to the physical safety of any person, violations of GFX's terms of use, or as otherwise required by law.

In all other instances, your data is processed and utilized for other purposes only if you have expressly consented to such utilization. Without such consent, your data will not, for example, be used for advertising purposes. You will receive advertising from GFX only if you have expressly consented to this. Such consent can be revoked at any time by sending an email to support@gfx-i.com

Personal user profiles are not generated by GFX.

Use of cookies

Cookies are small text files containing information that a Web Site uses to track your activities on the site. We may use cookies to analyze and understand users and their behavior on our site to help us improve the functionality and performance of the site, to help authenticate you, to customize the site and content so that we can provide you with information that suit your interests.

The information that is collected and shared is anonymous and not personally identifiable. Cookies are used solely to track the frequency of use and the number of persons using our Website, and to optimize the placement of advertising messages. On certain pages, the advertisements of companies or agencies are supplied direct; in such cases, it may be that cookies and/or web beacons are used without our being able to influence such use, or to advise you thereof. Responsible in such instances is the respective advertiser. You have our assurance that such information that we collect and share would be anonymous and not personally identifiable.

Our platform can also be used without cookies. The default setting on most browsers is such that cookies are automatically accepted. You can, however, deactivate the storing of cookies, or allow this only upon request. We do, however, have to point out you may, upon refusing to accept cookies, find it more difficult to use and navigate our Website.

Social Networks

Social networks are on-line groups, networks or communities of people who share some common element(s) such as a particular interest, and are interested in exploring and discussing such interests with others on the Internet. Social networking involves the on-line interaction of its members via multiple and various electronic formats, such as chat, messaging, email, video, voice chat, file sharing, blogging, discussion groups and so on.

A social network provides its members with many features, such as the ability to create and view profiles of other members who share commonalities. A social network also allows

members to create personal profiles, potentially with fairly detailed information, as well as allow its members to engage in activities such as create personal blogs, share personal information and other applications that allow its members to help them to connect with other network members.

Risks

Social networks are not without their risks, which are no different than any other on-line activity. With public spaces, or even within a closed social network community, the services can be used by anyone. There are risks as one does not truly know who the other members of the social network are.

GFX has no control over what third parties with access to your information may do with it. For example, you may post certain personal information, but another member copies and publishes it.

When using social networks, you should take caution when posting your personal information as well as carefully consider the information you get from the social network. You should take care in trusting the information posted in a social network as it may be difficult to prevent members or the public at large from posting false or misleading information, including information in their personal profiles. Although GFX takes reasonable steps to regularly monitor the content of its site to identify and remove any misleading or otherwise fraudulent posts, and may ban a member for egregious or repeat violations, there is no assurance that we will detect all misleading or fraudulent posts, and members should not rely upon or assume the accuracy of information posted by other members and should make their own independent trading decisions.

In addition, be careful with personal information. Once you have posted your personal information to the Internet, you have lost control over who will see it and how it will be used. Information you post or as contained in your profile can easily be copied and shared with thousands of others at the press of a button. In addition, when posting other materials, such as photos, you should take precaution as such information or pictures can be altered or distorted.

There is the potential for risk in using the GFX services stemming from the illegal or improper use of the social network by third parties who might, for example, post misleading information in an attempt to improperly influence trading decisions or find ways to copy and aggregate member profiles, collect personal financial information or copy personal content and use it for their own purposes.

Disclosure of information to third parties

We do not sell, trade, license or otherwise disclose to outside parties your personally identifiable information without prior consent from you. However, we may release your information to trusted third parties who assist us in operating our website, conducting

our business, or servicing you, as long as those parties agree to keep this information confidential.

Furthermore, we may also release your information when required to comply with the law, enforce our site policies, or protect our rights, property, or safety. Besides that, we may also provide non-personally identifiable visitor information to third parties for research, marketing, advertising etc.

Third Party links and Advertisements

This website may contain advertisements and links to outside third party content. However, this does not imply that we endorse any third party content that appear on our website or on any of these other third party websites. You are solely responsible and fully liable for reading, clicking or linking to any of such third party Websites. This Privacy Policy does not apply to your use of third party sites.

As permitted by applicable law, we may share the personal information described above with our affiliates for business purposes; such as servicing client accounts and informing clients about new products and services. Our affiliates may include companies controlled or owned by GFX, as well as companies which have an ownership interest in our company. The information we share with affiliates may include any of the information described above: your name, address, account information, etc. Our affiliates maintain the privacy of your information to the same extent that GFX does in accordance with this Policy.

With the exception of the purposes described in this Policy, GFX does not disclose personal information to third-parties. Third-party disclosures may include: sharing such information with non-affiliated companies that perform support services for your account or facilitate your transactions with GFX; including those that provide professional, legal, or accounting advice to GFX. Non-affiliated companies that assist GFX in providing services to you are required to maintain the confidentiality of such information to the extent they receive it and to use your personal information only in the course of providing such services and only for the purposes which GFX dictates. We may also disclose your personal information to third parties in order to fulfill your instructions or pursuant to your express consent. GFX will not sell your personal information.

Under limited circumstances, GFX may disclose your personal information to third-parties as permitted by, or to comply with, applicable laws and regulations. GFX may disclose personal information to cooperate with regulatory authorities, law enforcement agencies, to comply with subpoenas or other official requests, and as necessary to protect GFX's rights or property. Except as described in this Privacy Policy, your personal information will not be used for any other purpose unless we explicitly describe in what manner such information will be used at the time you disclose it to us or we obtain your permission.

In all other instances, your data is stored exclusively in our database and on our servers, or those of companies contracted by us to process data. With regard to the management and settlement of credit accounts in particular, outside contractors are used to perform

these tasks. Furthermore, data is passed on to third parties only if you have previously consented thereto.

Before you access or use any services on third party websites, please ensure that you review their Privacy Policy to understand how they will manage your information. Please exercise caution when visiting an external site. You also agree not to hold GFX liable for any loss or damage of any sort incurred from using any content, advertisements or links on this site.

Protecting your information

We put in place a variety of security measures such as SSL encryption technology, firewalls as well as authentication systems (eg. passwords and personal identification numbers) to ensure that your personal information is secure and kept confidential.

Whenever we gather data, we, or the data processor contracted by us, store this data on specially protected servers in Hong Kong. Access thereto is restricted to just a few specially authorized persons.

To avoid any loss or misuse of data stored with GFX, we have put extensive technological and operational security measures in place. These are regularly inspected and updated to reflect the latest technological advances. Notwithstanding this, we have to point out that the structure of the internet is such that data protection regulations may fail to be respected by other persons and institutions whose actions are beyond our control. Accordingly, it is the special responsibility of users to ensure that data made available by them is, by encryption or other means, protected against misuse.

Contact Us

Users may, at any time, submit to us questions relating to the processing of their personal data. These, together with any other questions relating to matters unanswered in this data protection statement, should be addressed to: support@gfx-i.com

For any questions relating to this Privacy Policy or the Site, please contact Client Management.

Changes to legal requirements

Amendments to applicable laws may necessitate changes to data protection provisions. You are therefore requested to check this data protection statement on a regular basis. It is your responsibility to ensure that you are aware of any modifications or updates made to our privacy policy on this page.