



## UMOFX PRIVACY POLICY

UMOfx fully respects its client's right to privacy. We value our affiliation with each of our client, and we are proud to maintain our association with every individual related to us. Loyalty and respect with each individual client are therefore very essential and we believe by providing our client with the most acceptable security, we can earn our client's trust. The requirements of this notice apply to former clients as well as our current clients. We kindly ask that you read the following information.

### General Requirements

The present Privacy Policy is a fundamental part of the public documents package, pursuant to which UMOFx officially represented. (Herein after referred to as the Company), provides various services (including services of financial and informational nature, etc.) to its Clients.

By opting the Company's services, the Client entirely agrees to all the terms and conditions of the public documents. The same applies to the interactions between the Client and the Company, during which trading and investment operations are performed, various informational materials are used, payments and transfers are arranged, etc. Should the Client disagree with any condition of the public documents package, she/he should stop all dealings with the Company. In case the Client deems the conditions of the present Privacy Policy objectionable for any basis whatsoever, she/he shall stop all interaction with the Company, including terminating all financial operations carried out with Company mediation.

The present Privacy Policy declares one of the most significant principles that the Company follows when providing the services to its Clients. The Company respects the right of every individual and legal unit for privacy irrespective of their being or not being the Clients of the Company, as well as those who only intend to interact with the Company. The conditions of the present Privacy Policy apply evenly to past, present and future Clients of the Company. One of the most important priorities of the Company is the association between the Company and its Clients. The Company maintains loyalty and respect for every Client individually, and grants every Client ideal security and privacy.

In the present Privacy Policy the following fundamental terms and definitions are used:

Privacy (confidential information) is a legal right of an individual or a legal unit for non-disclosure of private or personal information (data) or of information which is commercially classified. In the relation between the Company and the Client, privacy means the vow of the Company to preserve and guarantee non-disclosure of Client information gained by the Company, while rendering services to the Client.

Personal (private) information of the Client - information which characterizes, identifies or verifies the Client or discloses certain details of his/her personality, financial conditions, and preferences. A more thorough definition of this term can be found in the text of the present.



Privacy Policy is an intricate measures, procedures and actions that guarantee collection of full, accurate and genuine information regarding the Client, and the protection of this information, as well as the exchange of this information with governmental (regulatory) bodies in agreement with the existing legislation, and the conditions of the present Privacy Policy.

### **Individual information**

When the Client applies for or maintains a live or demo account with the Company, the Company collects individual information about the Client for business purposes, such as evaluating the Client's financial needs, processing the Client's wishes and deals, informing the Client about products and services that may be of attention to him/her, and providing efficient and excellence service to the Client.

Such information can be of the following types:

Registration information - information given by the Client on request forms and other documents (including electronic documents). This includes: first name, last name, patronymic name, contact information (postal address, telephone number, e-mail, etc.), and date of birth, occupation, assets and incomes.

Transaction Information - information about deals between the Client and the Company, or between the Client and the Affiliated Partners of the Company, as well as information about communications (unilateral or bilateral) between the Client and the Company. Examples include Client account balances, trading (investing) activity, Client inquiries and the Company responses, including texts of the mails or log-files in used messaging systems.

Confirmation Information - information necessary to validate Client identity such as a passport or driver's license (or articles of association in case the Client is a legal unit). Examples also comprise information received by the Company from public account, such as loan offices, information agencies and address bureaus or from other entities not allied with the Company.

The Anti-Money Laundering Policy requires the Company to collect information and take the essential action to avert transformation and legalization (laundering) of money gained from unlawful action. In certain cases the Company has the right to necessitate a document disclosing the sources of money.

Information about subscriptions - information such as signals, alerts, news category and price subscriptions.

The above is not inclusive. The Company reserves the right to necessitate other information from the Client in the case that it is needed for complying with the policy of existing legislation.

### **About "cookies"**



Cookies are small files containing information that a Web server (site) uses to track its visitors. The Company may set and access cookies on Client computers, to assess which advertisements and promotions draw users to the Company Web site. The Company (or any of its divisions) may use cookies to evaluate Client interest in Company products and services, and to track Client activities on its Web server (site).

The information collected by the Company and shared with its Affiliated Partners is anonymous and not personally identifiable.

#### Sharing information with third parties

The Company does not reveal the Client's personal information to third parties, except as described in this Privacy Policy. Third-party disclosures may comprise distributing such information with Non-Affiliated Partners of the Company that perform technical support services for Client accounts or assist Client deals with the Company, including those that supply professional, legal, or accounting counsel to the Company. Non-affiliated Partners that assist the Company in providing services to the Clients are required to uphold the privacy of such information to the degree that they accept it, and to use this personal information only in the course of providing such services, and only for the purposes that the Company dictates. The Company may also release the Client's personal information to third parties to perform Client orders or pursuant to the Client's express approval.

Company also notify its Clients that it shall never sell, place at interim disposal on a remuneration basis, distribute or disseminate the Client's Personal information under any conditions.

#### Regulatory disclosure

Under limited state of affairs, the Company may release the Client's personal information to third parties as allowed by, or to fulfill with, applicable laws and regulations. The Company may release personal information to assist with regulatory authorities and law enforcement agencies in complying with subpoenas or other official requests, and as necessary to protect Company rights or property. Except as described in the present Privacy Policy, the Company will not use the Client's personal information for any other reason except the Company describes how such information will be used at the time the Client discloses it, or if the Company obtains the Client's express permission. The Company has the right to employ the Client's Personal information in cases other than described in the present Privacy Policy if clearly stated at the time the information is disclosed by the Client or when the Company receives the Client's express permission.

#### Opt out

The Client may decline to provide any of the Personal information that the Company may request. However, failure to do so may result in the Company being incapable to open or sustain an account or to offer other services to the Client. While the Company makes every attempt to guarantee that services, provided to its Clients are based on accurate, absolute and the latest information about them, the Client can help in this respect by promptly informing the Company when there are



changes to his/her personal information. If the Client does not wish to have his/her Personal information revealed to third parties as described in the current Privacy Policy, s/he should contact the Company via detailed contact form.

### **Revision**

The Company has the right to make changes to the current Privacy Policy. In particular, this may take place in cases that are not described directly or indirectly in the current edition of the Privacy Policy, or if a rule or law passes that requires such adjustment or addition. Amendatory process:

Should adjustment be made, the Company shall notify the Clients of this by posting the pertinent notice on the official Company Web site and by sending the relevant message to Clients via the internal mail system. Posting the relevant notice on the Company Website and sending messages via internal mail are considered to be adequate Client Privacy Policy of the amendments, whether the Client reads and understands a corresponding text or disregards it. The amended document becomes effectual after 5 (five) full working days (120 hours) following publication of the notice on the Company Web site, before this time the notice has only an informative nature. The amended document instantly applies to any accounts registered after its publication (irrespective of other accounts registered earlier, which its holder may possess). The amended document applies to trading accounts that were registered prior to the date the document in question went into effect. In the case that a rule of law is introduced, which requires a corresponding amendment and/or addition to the present Privacy Policy, then the rule of law shall be applied immediately after the effective date of the relevant statutory act, whether the required amendment is made or not. Regulations of the present Privacy Policy that contradict the newly introduced rule or law become void once the corresponding amendments to the aforementioned document go into effect.

### **Acceptance by the client**

Being the Client of the Company and actively using its services (including broker and information services), its software and/or hardware that allow carrying out professional activity on the financial markets, I accept the Privacy Policy described in the present Privacy Policy. I hereby agree with all the conditions (paragraphs, clauses) of the Company public documents for using the Company services and will immediately cease using such Company services in case of disagreement.