

PRIVACY POLICY
CFI International Ltd

Regulated by the Financial Services Commission (FSC)

1. INTRODUCTION

CFI International Ltd (hereinafter “the Company”, “us”, “our” “we”) holds an Investment Dealer (Full service Dealer, excluding underwriting) Licence, C118023104 since the 14th January 2019, pursuant to Section 29 of the Securities Act 2005, Rule 4 of the securities (Licensing) Rules 2007 and the Financial Services (Consolidated Licensing and Fees) Rules 2008.

By accessing our website (<https://cfifinancial.com>) and using our services, the Client acknowledges and consents to his/her personal data being collected and processed by the Company.

In order to open a trading account with the Company, potential clients are required to provide some personal information during the registration process. The reason for the collection the way the Company utilizes such information is explained further in this Policy.

2. INFORMATION COLLECTED

The Company may collect the following information (non-exhaustive list) when potential Clients register on the website:

- Name and Surname
- Date of Birth
- Gender
- E-mail address
- Full residential address
- Phone number
- Information whether you are a Politically Exposed Person (PEP)
- Tax residence and Tax Identification Number
- Photo ID or passport
- Transaction details
- Date of registration
- IP address
- Geographical Location
- Any other required personal data

3. USE OF PERSONAL INFORMATION

All the information shared with the Company shall be treated as confidential and will be used for the following purposes:

- Legal Obligations: The Company is required under Vanuatu regulation to collect necessary information to combat and prevent money laundering and terrorist financing.
- Contractual Obligation: In order for a Client to be onboarded, we have to request identifying information, as mentioned in Section 2, to verify the personal information as this is further explained in our Terms and Conditions.
- Operation of the website: By collecting information, we can prepare and provide a more tailored website to satisfy our clients needs.
- Providing, promoting, and Improving our services: Through the collection of information we can better understand our clients needs and provide them with a service more suitable to their requirements.
- Complaints' enquiries: to perform an enquiring concerning your complaints, we may use the data you have provided upon enquiry.
- Maintaining back-ups for our databases and keeping proper records (as this is required by law)

- Statistical and Marketing Purposes: if you consent to receive our marketing communication materials, we will use the personal data you have provided to send you information about our products, services, and upcoming events.
- Client Communication: The information you have provided us will be the method in which we communicate with our clients where that is deemed necessary.

The Client undertakes the responsibility to update us as soon as possible and no more later than the 10th day from which any of the provided information have changed. Failure to do so may lead to position closure, account closure and a report to the regulator. Clients are obliged not to impersonate any other natural person and is their responsibility to provide correct and accurate information as these are requested by the Company.

4. METHOD OF COLLECTION

Any information that is collected, can be done so through numerous ways including the website, mobile app, account opening and registration, demo sign ups and any information collected during customer service communications. Information may also be collected from any medium which makes information publicly available. (e.g. Social Media and other service providers)

To comply with further regulations, we may keep records of you trading activities and behaviours, including reports, statements, and trades for the following:

- Products traded on our platform and their overall performance
- Historical data and investments you have made during our time with us, including amounts invested
- Preference in the type of products

The Company maintains the right to record any communications, either electronic, by telephone, in person or other methods not limited to the aforementioned, in relation to the services provided to you and your business relationship with our Company. These communications shall constitute Company property and will be considered as evidence of our communications between us and our clients.

5. COOKIES POLICY

We use cookies to store and collect information about your use of our Website. Cookies are small text files stored by the browser on your equipment's hard drive. They send information stored on them back to our web server when you access our Website. These cookies enable us to put in place personal settings and load your personal preferences to improve your experience. You can find out more about our cookies on our "Cookies Policy" available on our Website.

We may use external organisations to help manage, update, create and maintain our website, analysing all statistical data collected. Such organisations may install and use their own cookies on our behalf.

6. STORAGE OF PERSONAL INFORMATION

Keeping client and other information secure is of great importance to our Company and any such information held, however they may have been collected, shall remain in the Company's records throughout the period in which a client has a business relationship with us.

Records of all information may be kept in secure computer storage, paper-based files and other records, taking all appropriate measures to protect such personal information from being lost, misused, modified or disclosed.

We may maintain records for as long as necessary to meet legal, regulatory and business requirements. Retention periods may be extended if we are required to preserve Client Information in connection with litigation, investigations and proceedings. Further to the time mentioned above, records will be securely destroyed and removed from our possession. Communications between the Company and Clients will also be held for a period of up to 5 (five) years.

7. RESTRICTION OF RESPONSIBILITY

The Company does not hold any responsibility and shall not be held responsible for the Privacy Policies of any other third-party company, or partner that may be linked to it. The company also has no control on how Client information will be used by such third-parties or partners.

The Company shall not be liable for information provided by the client to any linked websites which are not operated by the Company. Please note that such information is recorded by a third party and will be governed by the privacy policy of that third party.

8. CHANGES AND UPDATES TO THIS PRIVACY POLICY

This Privacy Policy is reviewed once a year taking into account the changes in local and international legislation but also the changing environment and advances in technologies. This is to ensure that it remains appropriate to the changing environment.

The Company shall inform Clients about any changes in this Privacy Policy document and as to how their information is affected following the aforementioned changes.