

Statement on Privacy and Cookie Policy

SmartHub (referred hereinafter as “the company”, “we”, “us” or “our”) policy is to respect the confidentiality of information and the privacy of individuals. We are also bound by principles contained in the Law on Processing of Personal Data (Protection of the Individual), the EU e-Privacy Directive and the VFSC regulations. This Privacy Policy Statement outlines how we manage and protect the personal information provided by our customers ("The Policy"). By visiting our website and using our services your agreement to this Policy is implied.

This Policy will be reviewed from time to time to take account of changes to our operations or practices and, further, to make sure it remains appropriate to any changes in law, technology and the business environment. Any information held will be governed by our most current Policy.

By using this Website and our Trading Platform, you automatically accept our Privacy and Cookie Policy.

What information do we collect?

You supply us with your personal information through the account application process, which we are required to retain. We also maintain information as a result of your trading activity, website usage and cookie policy (see below). When you visit our website or use our services, we may also log your IP address, a unique identifier for your computer or other access device (such as an iPad or iPhone). For quality and control purposes we may monitor and record communications with you. Generally, this information is obtained when you agree to register as a customer and use our services. The cookie permission settings in your web browser imply consent to our Cookie Policy.

How do we use it?

We use information about you in the following ways:

- We use your personal details and information obtained from other sources for the purpose of satisfying regulatory and legal requirements, for marketing, administration and customer services, to ensure that the content and services that we offer are tailored to your needs and interests. We keep your information for a reasonable period for these purposes. We may need to share your information with our service providers and agents. Generally, we require that third party organizations who handle or obtain personal information as service providers acknowledge its confidentiality and undertake to respect an individual's right to privacy and comply with Data Protection principles including this Policy.
- We or agents acting on our behalf may perform identity, money laundering and fraud prevention checks and may pass your details onto other group companies and other organizations (including law enforcement agencies) involved in fraud prevention and detection who may use your information in the same way;
- We may use the information you provide us to send you SMS or email communications for you to view, this includes, but is not limited to, margin calls or other information.
- By providing us with your personal information you give us your consent to process your personal data for the above purposes. You also agree on the transfer of your information, for the aforementioned goals, by us to others countries or jurisdictions.

Confidentiality and Personal Data Protection

- The Company may collect client information directly from the Client (in his completed Account Opening Application Form or otherwise) or from other persons including, for example, the credit reference agencies, fraud prevention agencies, banks, other financial institutions, third authentication service providers and the providers of public registers.

- Client information which the Company holds is to be treated by the Company as confidential and will not be used for any purpose other than in connection with the provision, administration and improvement of the Services, anti-money laundering and due diligence checks, for research and statistical purposes and for marketing purposes. Information already in the public domain, or already possessed by the Company without a duty of confidentiality will not be regarded as confidential.
- The Company has the right to disclose Client information (including recordings and documents of a confidential nature, card details) in the following circumstances:
 - Where required by law or a court order by a competent Court.
 - Where requested by VFSC or any other regulatory authority having control or jurisdiction over the Company or the Client or their associates or in whose territory the Company has Clients.
 - To relevant authorities to investigate or prevent fraud, money laundering or other illegal activity.
 - To such an extent as reasonably required so as to execute Orders and for purposes ancillary to the provision of the Services.
- To credit reference and fraud prevention agencies, third authentication service providers, banks and other financial institutions for credit checking, fraud prevention, anti-money laundering purposes, identification or due diligence checks of the Client. To do so they may check the details the Client supplied against any particulars on any database (public or otherwise) to which they have access. They may also use Client details in the future to assist other companies for verification purposes. A record of the search will be retained by the Company.
 - To the Company's professional advisors provided that in each case the relevant professional shall be informed about the confidential nature of such information and commit to the confidentiality herein obligations as well.
 - To other service providers who create, maintain or process databases (whether electronic or not), offer record keeping services, email transmission services, messaging services or similar services which aim to assist the Company collect, storage, process and use Client information or get in touch with the Client or improve the provision of the Services.
 - To a Trade Repository or similar under the Regulation (EU) No 648/2012 of the European Parliament and of the Council of 4 July 2012 on OTC derivatives, central counterparties (CCPs) and trade repositories (TRs) (EMIR).
 - To other service providers for statistical purposes in order to improve the Company's marketing, in such a case the data will be provided in a summarized form.
 - To market research call centers that provide telephone or email surveys with the purpose to improve the services of the Company, in such a case only the contact details the data will be provided.
 - Where necessary in order for the Company to defend or exercise its legal rights to any court or tribunal or arbitrator or Ombudsman or governmental authority.
 - At the Client's request or with the Client's consent.
 - To an Affiliate of the Company or any other company in the same group of the Company.
 - If the Client is a natural person, the Company will use, store, process and handle personal information provided by the Client in connection with the provision of the Services, in accordance the Law on Processing of Personal Data (Protection of the Individual) and the Company is obliged to supply the Client, on request, with a copy of personal data which it holds about the Client (if any), provided that the Client pays an administrative fee.
- By entering into Agreement, the Client will be consenting to the transmittal of the Client's personal data outside the European Economic Area, according to the provisions of the Law on Processing of Personal Data (Protection of the Individual) for the reasons specified above.
- Phone conversations between the Client and the Company may be recorded and kept by the Company and recordings will be the sole property of the Company. The Client accepts such recordings as conclusive evidence of the Orders or any conversations so recorded.
- The Client accepts that the Company may, for the purpose of administering the terms of the Agreement, from time to time, make direct contact with the Client by phone, email or post.

Use and management of cookies

We may obtain information about you by accessing cookies when you visit our website or use our services.

Definition: A cookie is a small amount of data that often includes a unique identifier that is sent to your computer or mobile phone (referred to here as a “device” browser from a website's computer and is stored on your device's hard drive for tracking site usage. A website may send its own cookie to your browser if your browser's preferences allow it, but, to protect your privacy, your browser only permits a website to access the cookies it has already sent to you, not the cookies sent to you by other websites. Many websites do this whenever a user visits their website in order to track online traffic flows.

You can delete cookies any time you want by using the settings in your web browser. You can also use your web browser to disable cookies, although this and other websites may not function properly if you do this and you may not be able to sign in. Further information on deleting or controlling cookies is available at www.AboutCookies.org.

This website uses Google Analytics, a web analytics service provided by Google Inc. ("Google"). Google Analytics uses "analytical cookies" placed on your computer to help the website analyze a user's use of the site. The information generated by the cookie about your use of the website (including your IP address) may be transmitted to and stored by Google on their servers. Google may use this information for evaluating your use of the website, compiling reports on website activity and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

Our cookies policy: During the course of any visit to the Company's website, the pages viewed, along with a cookie are downloaded to the Clients device. Cookies stored may determine the path the Client took on our site and used to anonymously identify repeat users of the website and what pages were most popular for Clients. However, the Company protects the Client's privacy by not storing the Client's names, personal details, emails, etc. Using cookies is an industry standard and is currently used by most major Websites. Stored cookies allow the Company's website to be more user-friendly and efficient for Clients by allowing the Company to learn what information is more valued by Clients versus what isn't.

How do we protect your information?

We take appropriate measures to ensure that the information you disclose to us is secure, accurate, up to date and kept only for so long as is necessary for the purposes stated and in accordance with any statute of limitations. It is held in secure computer storage facilities and subject to procedures to prevent accidental loss, destruction or damage.

You are entitled to ask for a copy of the information we hold about you (for which we may charge a small fee) and to have any inaccuracies in your information corrected. Please notify us of any changes of address or any other personal circumstances to enable us to maintain a correct record.

When and how to contact us

If your personal details change, if you have any queries about how we use your information, or wish to help us improve this Policy, please notify us by contacting us at: support@smarthubfx.com.