

PRIVACY POLICY

At Fidelis Capital Markets ("Fidelis") we consider the privacy of our Visitors and Clients to be of the utmost importance. We employ a state of the art security software system so that our Clients can trade in a safe and secure environment. This privacy policy document ("Policy") describes in detail the practices and policies followed by Fidelis in using, disclosing, collecting and retrieving personal information and sensitive personal information, that is collected and recorded upon the registration of a live trading account or demo account via the Website.

By opening a trading account with Fidelis you give your consent for the collection and usage of personal information and sensitive personal information by Fidelis as stated in this Policy. Fidelis reserves the right to amend or review this Policy without any prior notice. The updated Policy will become effective from the date of its publication on the Website and will form a part of the terms of use given on the Website. Any continued use of the Website or services on the Website signifies your acceptance of the updated Policy. Therefore Visitors and Clients are advised to regularly visit the Website for notices relating to changes in the Policy.

This Policy is governed by the Republic of Cyprus law.

Personal Information and Sensitive Personal Information

When you apply for or maintain a live account with Fidelis, you give consent for the disclosure of personal and sensitive information to Fidelis. Fidelis collects personal information and sensitive personal information for business purposes, such as evaluating your financial needs, providing services, processing your requests and transactions, informing you about products and services that may be of interest to you, providing customer service and internal administration.

Such personal information may include:

- Application information: Information you provide to us on applications and other forms, such as your name, address, birth date, government issued identification, occupation, assets, income and
- Verification information: Information necessary to verify your identity, such as a passport or driving license. Examples also include background information about you, which we receive from public records or from other entities not affiliated with Fidelis

Such sensitive personal information includes information of your transactions with us, information about your account balances, bank account/credit card information

Disclosure and Usage of Personal Information and Sensitive Personal Information

Once the account is opened via the Website, you automatically become a Client and are provided with a unique account number, which becomes your User ID and is accompanied by a password for managing your account. The information provided by you upon registration of the account is password protected so that only you have access to the information. Fidelis will never ask for your password through unsolicited phone calls or unsolicited emails. By completing an account application with Fidelis and submitting the



required documentation, you are disclosing personal information to Fidelis Capital Markets, which will never be used without your consent. Fidelis may also obtain information by:

- Observing your usage of the Fidelis website
- Accepting the products and services offered to you by Fidelis Capital Markets

If you do not wish to provide personal and sensitive information, you should immediately withdraw from registering for the live account. This can be done by contacting Fidelis and ask them to correct, amend, modify or withdraw such information. Please note, that if all information has been withdrawn, you will not be able to use the services provided by Fidelis Capital Markets.

In the event you provide incomplete or incorrect personal information or sensitive personal information, you must immediately correct the information. Fidelis will not be held responsible for any incorrect or incomplete information or any consequences arising from disclosure of such incomplete or incorrect information. You will completely indemnify Fidelis, its affiliates, officers and employees against all claims or losses arising due to furnishing incorrect or incomplete information. If you provide incorrect or incomplete information, Fidelis may at any time cease to provide services to you at its sole discretion.

Please note that any personal or sensitive personal information displayed by you on message boards or chats on the Website can be collected and used by others and does not remain secure. Therefore, you must refrain from posting such information anywhere on the Website. If you close your Fidelis account, your personal information and sensitive personal information is retained by us and used only to comply with regulatory requirements, and to periodically contact you to

offer you the opportunity to reactivate your account or participate in other promotions or offers (should you chose to receive such information).

You must also remember that any personal or sensitive personal information displayed by you on message boards or chats on the Website can be collected and used by others and does not remain secure. Therefore, you must refrain from posting such information anywhere on the Website. If you close your Fidelis account, your personal information and sensitive personal information is retained by us and we use it to comply with regulatory requirements, and to periodically contact you to offer you the opportunity to reactivate your account or participate in other valuable offers (should you chose to receive such information).

Only persons authorized by Fidelis will have access to the information disclosed by you. By opening the account, you consent to sharing of such information with persons or entities associated with Fidelis. Fidelis does not sell, license, lease or otherwise disclose your information to any third party, for any reason, except in cases where the disclosure is required under applicable law.

GENERAL INFORMATION

The General Information collected by Fidelis is neither personal nor sensitive personal information. Fidelis receives the General Information through the use of cookies, which are small text files sent from the web server to your computer. Cookies help Fidelis to get to know you better by providing operational data Fidelis uses to aid in your interaction on the Website by improving navigation and usability. You also have



the option of disabling the cookies via your browser preferences. However, disabling cookies on the browser will result in some parts of the Website not functioning as effectively. Additionally, to administer and improve the Website, we may also use a third party to track and analyze usage and volume statistical information such as page requests, form requests, and click paths. Third parties may use cookies to track behavior and may set cookies on behalf of the Website and these cookies do not contain any personally identifiable information.

SECURITY SYSTEMS

Fidelis has taken all strict measures and precautions to keep personal information and sensitive personal information safe and secure and to prevent any unauthorized access to or misuse of the same. Fidelis will not be liable to any Client or Visitor (whether in contract, tort (including negligence) or otherwise) for any loss, damage (whether direct, indirect, consequential or incidental) or harm caused to any Client or Visitor due to the unauthorized access or misuse of the personal information and/or sensitive personal information by any third party (beyond the reasonable control of Fidelis). Fidelis has a comprehensive and documented information security program that contains managerial, technical, operational and physical security control measures. The security practices are regularly reviewed to ensure they comply with the international standards on information technology-security techniques and approved best practices for data protection.

However, prevalence of identity theft has been in the news lately. We, at Fidelis, would like to help you avoid falling a victim to this. As such, we have included some helpful information with respect to online identity theft and security reminders in the last section of this policy. We would suggest to you to carefully read the section in this Policy on "Online Identity Theft and Security Reminders"

OPT OUT

If you do not wish to have your personal information or sensitive personal information disclosed to our affiliates or other third parties as described in this Policy, please contact us via e-mail at compliance@fcmforex.com.

Fidelis Capital Markets is not responsible for the privacy policies or the content of sites that the Website may link to, and therefore, have no control over the use or protection of information provided by you or collected by those sites. Whenever you click on a link, logo or other such items or elect to link to a co-branded or linked website, you may be asked to provide registration or other information. Please note that the information you are providing goes to a third party and you should familiarize yourself with the privacy policy provided by the third party.

If you still have questions that this Policy does not address, feel free to contact a client services representative.

Online Identity Theft and Security Reminders

How Online Identity Theft Can Happen



Many identity thieves use malicious software programs to attack vulnerable computers of online users. These software programs can monitor your computer activity and send information back to the thief's computer. Sometimes, these

programs will log your key strokes, which allows identity thieves to easily obtain username and password information for any of your online accounts, including your brokerage account.

Other identity thieves "phish" for your personal information. "Phishing" involves the use of fraudulent emails and copy-cat websites to trick you into revealing valuable personal information - such as your account number, your social security number, and the username and password information you use when accessing your account. Sometimes fraudsters will use phishing scams to try to get you to download keystroke logging or other malicious software programs unsuspectingly.

But not all identity thieves are "high tech". Many still use less sophisticated ways of stealing your personal information, such as looking over your shoulder when you're typing sensitive information or searching through your trash for confidential account information.

HOW TO PROTECT YOURSELF ONLINE

We suggest you protect yourself against identity thieves, whether hackers, phishes, or snoops, when you use your online brokerage account. Here are a few suggestions on ways to keep your personal information and money more secure when you go online:

- **Tighten Your Security:** Personal firewalls and security software packages (with anti-virus, anti-spam, and spyware detection features) are a must-have for those who engage in online financial transactions. Make sure your computer has the latest security patches, and make sure that you access your online brokerage account only on a secure web page using encryption. The website address of a secure website connection starts with "https" instead of just "http" and has a key or closed padlock in the status bar (which typically appears in the lower right-hand corner of your screen).
- **Security Tip:** Even if a web page starts with "https" and contains a key or closed padlock, it's still possible that it may not be secure. Some phishes, for example, make spoofed websites which appear to have padlocks. To double-check, click on the padlock icon on the status bar to see the security certificate for the site. Following the "Issued to" in the pop-up window you should see the name matching the site you think you're on. If the name differs, you are probably on a spoofed site.
- **Be Careful What You Download:** When you download a program or file from an unknown source, you risk loading malicious software programs onto your computer. Fraudsters often hide these programs within seemingly benign applications. Think twice before you click on a pop-up advertisement or download a "free" game or gadget.
- **Use Your Own Computer:** It is generally safer to access your online brokerage account from your own computer than from other computers. If you use a computer other than your own, for example, you won't know if it contains viruses or spyware. If you do use another computer, be sure to delete all "Temporary Internet Files" and clear all "History" after you log off your account.

- **Don't Respond to Emails Requesting Personal Information:** Fidelis or its authorized employees and any other legitimate entity will not ask you to provide or verify sensitive information through a non-secure means, such as email. If you have reason to believe that Fidelis or any other financial institution actually does need personal information from you, pick up the phone and call the company yourself - using the number in your rolodex, not the one the email provides!
- **Fake Link:** Even though a web address in an email may look legitimate, fraudsters can mask the true destination. Rather than merely clicking on a link provided in an email, type the web address into your browser yourself (or use a bookmark you previously created).
- **Be Smart About Your Password:** The best passwords are ones that are difficult to guess. Try using a password that consists of a combination of numbers, letters (both upper case and lower case), punctuation, and characters. You should change your password regularly and use a different password for each of your accounts. Do not share your password with others and never reply to

phishing emails with your password or other sensitive information. Do not store your password on your computer. If you need to write down your password, store it in a secure, private place.

- **Use Extra Caution with Wireless Connections:** Wireless networks may not provide as much security as wired Internet connections. In fact, many "hotspots" - wireless networks in public areas like airports, hotels and restaurants - reduce their security so it is easier for individuals to access and use these wireless networks. Unless you use a security token, you may decide that accessing your online brokerage account through a wireless connection is not worth the security risk.
- **Log Out Completely:** Closing or minimizing your browser or typing in a new web address when have finished using the online account may not be enough to prevent others from gaining access to your account information. Instead, click on the "log out" button to terminate your online session. In addition, you should not permit your browser to

"remember" your username and password information. If this browser feature is active, anyone using your computer will have access to your brokerage account information.

Once again, we hope that you will find this information helpful. Please feel free to contact our Customer Care department should you have any further questions.

A Visitor is defined as any person who visits, uses, accesses or browses through www.fcmforex.com in any manner whatsoever and does not open a live or demo account with Fidelis.

A Client is defined as any person who opens a live or demo account on www.fcmforex.com for trading in foreign exchange.

The Website refers to the website of Fidelis, which can be accessed at www.fcmforex.com.



General Information includes information relating to your date and time of visiting the Website, internet protocol (IP) address, browser type, operating system, internet service provider (ISP), time stamps, transactions placed and banner ads you may click on the Website.