

Version 1, September 2017

## Privacy and cookies policy

KEY WAY INVESTMENTS LTD. with company registration number 341196 of registered office address at 2, Sophouli Street, Chanteclair Building, 6th Floor, Office 602, CY-1096, Nicosia, Cyprus (hereinafter: “We”, “Us”, the “Company”) is regulated by the Cyprus Securities and Exchange Commission, CySEC, ([www.cysec.gov.cy](http://www.cysec.gov.cy)), under the license number 292/16. Our Offices are located at 2 Sofouli Street, Chanteclair Building, 6th Floor, Office 602, Nicosia, Cyprus

To help us to understand the needs of our customers and improve our service, data collected on our website at [www.cfdglobal.com](http://www.cfdglobal.com) will be held on our secure database. All customer data stored on our servers complies with statutory requirements. We will never make this data available to any other company or third party unless as stated further below.

### 1. Security

We endeavour to protect the information you provide and ensure that your privacy is protected and there are strict security procedures that have been put in place. Our servers can only ever be accessed by our authorised personnel.

While we will use all reasonable efforts to safeguard your information, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data transferred from you, or to you via the internet.

### 2. Your consent

By using our website and allowing cookies on your browser which gives us access to certain information or manually submitting your information to us you consent to the use of that information as set out in this privacy policy. If we change our privacy policy we will post the changes on this page, and may place notices on other pages of the website, so that you may be aware of the information we collect and how we use it at all times. Continued use of the service will signify that you agree to any such changes.

### 3. The collection of personal information

The Company collects the necessary information required to open a client's trading account, perform transactions and safeguard the client's assets and privacy and to provide clients with the services they require. In this respect, the Company gathers information from clients and may, in certain circumstances, gather information from banks and/or credit agencies, and/or clearing agencies and/or other sources which will help the Company to construct the clients' profile based on their requirements and preferences in order to provide its services effectively.

The information the Company collects includes information required to communicate with and identify its clients. The Company may also collect certain demographic information, including, birth date, education, occupation, etc. The Company also assesses trading related information.

The Company uses clients' personal information only as required to provide quality service and security to its clients. This information helps the Company to improve its services, customize browsing experience and enables it to inform its clients of additional products, services or promotions relevant to clients and in this respect the clients hereby consent to the usage of this data for such purposes. If the clients do not want to receive information of this nature for any reason, they can contact the Company at the following address: [info@keywayinv.com](mailto:info@keywayinv.com)

### 4. Protection of personal information

Any personal information provided by the client to the Company will be treated as confidential and shared only with the Company and its affiliates and will not be disclosed to any third party except under any regulatory or legal proceedings. In case such disclosure is required to be made by law or any regulatory authority, it will be made on a 'need-to-know' basis, unless otherwise instructed by the regulatory authority. Under such circumstances, the Company shall expressly inform the third party regarding the confidential nature of the information.

## 5. Non - Identifiable Information Collection

When you access our website, we collect non-identifiable information in the following ways:

### 5.1. Log Data

When you access our website, we collect information that your browser sends whenever you visit a website or online service (“Log Data”). This Log Data may include, but is not limited to, your computer’s Internet Protocol address, browser type, the web page you were visiting before you came to the Site and information you search for on the Site and the Service. In addition, if you access the Service via a mobile device, we may collect a PushID, subject to your consent as indicated by you in the mobile application, and a Mobile IP.

### 5.2. Cookies

Cookies are small text files stored by your browser on your computer or device when you visit certain pages or perform certain actions on this and other websites. They are used to help your browser remember your choices and display the correct information for you - such as items in your basket - and not treat you as a new visitor each time you visit a page.

Some cookies are only set for the duration of your visit (“session cookies”) to help you get around and give you relevant information. Others are set for longer periods (“persistent cookies”) so that your browser can remember your choices from a previous visit. The cookies stored cannot harm your device, are anonymous, and unique to your browser.

You can choose to disable or block these cookies in your browser but without some of them our site will not work. For more detailed information about cookies please visit [www.allaboutcookies.org](http://www.allaboutcookies.org).

#### 5.2.1. How we use cookies?

We use cookies to help us find which services you are interested in and remember details about your application. We don't store sensitive information like your name or address in our cookies, just an anonymous reference to them so that we're able to find them.

We also occasionally set cookies to help you navigate around the site, enhance your experience, or give you important information regarding interests.

#### 5.2.2. Third party Cookies

In order to give you the best possible client experience, we collaborate with a number of third parties to help us collect anonymous statistics about how our site is being used and provide you with further information that may be of interest to you. As part of this process our third-party partners may set their own cookies during your visit.

#### 5.2.3. Cookies Settings

If you do not want to receive certain categories of cookies on our website, you can opt-out of them. We will need to set a cookie so that we can remember your choices when you next visit the website from the same browser. At the present time it is not technically possible for us to allow you to carry your settings with you between your browsers and devices so you will need to change these settings from each browser you use.

Please also be aware that we make every effort to respect your choices, however, there is the possibility that not all cookies will be captured. If this is a concern then we would recommend that you change your cookie settings via your browser; your browser help function will tell you how.

Note: most of our website may work without cookies, but you will lose some features and functionality if you choose to disable cookies.

### 6. Google Analytics

We use Google Analytics on the website, a web analytics service provided by Google, Inc. ("Google"). Google Analytics is used to help us obtain data regarding the use of the website. 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 servers in the United States. Google will use this information for evaluating your use of the website, compiling reports on website activity for website operators 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. You may refuse the use of cookies by selecting the appropriate settings on your browser, however please note that if you do this you may not be able to use the full website functionality. 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.

#### 7. How We Use Information

We use your information in order to (i) monitor and analyse use of the website and for the technical administration of the website, (ii) improve the website, (iii) generate and derive useful data and information concerning the interests, characteristics, use and behaviour of our visitors.

#### **Aggregate Information and Non-Identifying Information.**

We may share aggregated information, including queries and offers generated as a result of your use of the website, that includes non-identifying information and Log Data, with third parties for industry analysis, demographic profiling, other commercial purposes and to deliver targeted advertising about products and services. Any aggregated information shared in these contexts will not contain any personal information.

#### **Compliance with Laws and Law Enforcement.**

We cooperate with government and law enforcement officials and private parties to enforce and comply with the law. The Company reserves the right to disclose personal information to third parties where required by law, regulatory, law enforcement or other government authority of a competent jurisdiction in order to protect our rights and/or to comply with such legal proceedings. Such disclosure shall occur on a 'need-to-know' basis, unless otherwise instructed by a regulatory or other government authority. Under such circumstances, the Company shall expressly inform the third party regarding the confidential nature of the information.

#### **Business Transfers.**

We may sell, transfer or otherwise share some or all of our assets, including among others your Personal Information and Log Data, in connection with a merger,

acquisition, reorganization or sale of all or substantially all of our shares or assets, or in the event of our bankruptcy.

In addition, we may post additional ancillary privacy notices with respect to specific services.

#### 8. Duration of keeping information

We will not keep your information for any longer than is required. In many cases, information must be kept for considerable periods of time. Retention periods will be determined by taking into account the type of information that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable time.

#### 9. Scope of the Policy and Third-Party Sites

This policy applies only to us and this website. We do not exercise control over other websites, or over banners or links from within our website. These other websites, banners or links may place their own cookies or other files on your computer, collect data or solicit personal information from you subject to such third party's privacy policy. We encourage you to read the privacy policies and other terms of such third parties before accessing or using them.

#### **How to contact us:**

We welcome your views about our website and our privacy policy. If you would like to contact us with any queries or comments please send an e-mail at [info@keywayinv.com](mailto:info@keywayinv.com)