

# Privacy Policy

May 2019



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## Tier1FX (Bermuda) Limited

### Privacy Policy

#### YOUR PRIVACY

Tier1FX (Bermuda) Limited and its affiliates (“Tier1FX” or “we”) are committed to protecting the privacy of the personally identifiable information that we collect from you as you use this Website (the “Site”). The scope of Tier1FX’s commitment is detailed in this Privacy Policy. By submitting information, you agree to Tier1FX’s use of such information as described herein. Please see our Terms of Use for more information about our online policies in general.

Tier1FX collects personally identifiable information on certain areas of the Website when users register, request publications or other information. The personally identifiable information collected may consist of a unique access ID, company or, titles, and contact information, such as names, mailing addresses, e-mail addresses, and telephone and fax numbers. The data we collect from and about you is primarily for the purposes of the Company to provide a suitable and appropriate service to you and to comply with its regulatory obligations.

Tier1FX uses your personally identifiable information to fulfill your requests for publications or other information, to process your requests to participate in conferences and events, and to evaluate any job applications or other employment-related inquiries that you may submit. Tier1FX also uses personally identifiable information to perform statistical analyses of user behavior in order to measure interest in specific areas and articles posted on our Site.

The e-mail addresses provided at registration allow us to send e-mail to individuals based on the areas of interest that they indicate during the registration process. If you do not wish to receive e-mailed advance notice of articles, simply notify us at [support@tier1fx.bm](mailto:support@tier1fx.bm) or opt out directly from your Client Portal’s Profile section.

Tier1FX shall not intentionally disclose (and shall take commercially reasonable steps to prevent the accidental disclosure of) your personally identifiable information to third parties (i.e., persons or entities that are not affiliates of Tier1FX), whether for such third parties or marketing purposes or otherwise, subject only to the following five exceptions:

- 1) Tier1FX may disclose your personally identifiable information to third parties as required or permitted by the laws, rules, and regulations of applicable jurisdictions;
- 2) Tier1FX may disclose your personally identifiable information to third parties who deliver information from us to you for the purpose of performing such delivery;
- 3) Tier1FX may disclose your personally identifiable information if, in connection with submitting the information, you consent to such disclosure;
- 4) Tier1FX may disclose contact information for you in response to inquiries by bona-fide rights owners in connection with allegations of infringement of copyright or other proprietary rights arising from information you have posted on the Site or otherwise provided to us;
- 5) If Tier1FX and/or any of its affiliates merges with or sells substantially all of its assets or a majority of its equity to a third party, information collected may be disclosed to and owned by the merged entity or third party.

We will not lend or sell your information to third parties.

We will undertake to keep your personal information accurate. This will require us to contact you at regular intervals in order to update the data we hold in relation to the account(s) we hold for you. If at any time the information you have provided the Company becomes out of date, we ask you to notify us directly and we shall remove or amend the information, and in accordance with regulatory and legislative requirements.

You may access, correct, update, and/or delete any personally identifiable information that you submitted to us. Notify us at [support@tier1fx.bm](mailto:support@tier1fx.bm).

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**Risk Disclaimer:** Trading in any market carries risk, and trading foreign exchange (“FX”), futures, options, contract for differences (CFDs) and precious metals involve a substantial risk of loss that may not be suitable for you. Leverage or “gearing” creates enhanced risk and loss exposure. If you decide to trade in these markets we ask that you carefully consider your trading objectives, experience, and risk appetite. Even though risk can be managed, it cannot be eliminated and losses can quickly compound and exceed your initial deposit. You are liable for all losses and debits in your account.

Tier1FX understands the importance of protecting children's privacy, especially in an on-line environment. The Site is not intentionally designed for or directed at children 18 years of age or younger, and Tier1FX will not intentionally collect or maintain information about anyone under the age of 18.

### Cookies

Tier1FX may set and access proprietary and other cookies on your computer, enabling us to learn which promotions bring users to our Web site. The GDPR and the EU e-Privacy Directive requires your prior, informed consent to allow cookies to track your personal data focusing on your website behavior on our websites in order to give you better online experience. If required, the website will detail a complete overview of all active cookies and online tracking in use on the website and will include a monthly scan of all of the pages of the website, that detects and identifies all of the cookies and known tracking technologies in use on the site.

A cookie is a text file that a website can send to your browser, which may then be stored on your hard drive for a more efficient access and online experience. A cookie will enable the Company to gather information on how visitors are using the website. It does this specifically to make improvements to the website.

The data collected will be used solely for statistical analysis relating to your browsing behavior on our website, including the number of visitors, the pages viewed, time spent on particular pages and so on. We will not know who you are (unless you visit our secure client pages). We will not store any personal or confidential information about you and the Company will not attempt to identify individual visitors via their IP address unless required to do so by law or regulation.

We may provide links to third-party Websites as a service to our users. In addition, some of the content appearing to be on this Site is in fact supplied by third parties, for example, in instances of framing of third-party Websites or incorporation through framesets of content supplied by third-party servers. Please be aware that we cannot control and are not responsible for the information collection practices of such third-party Websites, which may differ from those of this Site. We encourage you to review and understand the privacy policies on these Websites before providing any information to them.

### Security

Tier1FX has implemented generally accepted standards of technology and operational security in order to protect personally identifiable information from loss, misuse, alteration, or destruction. Only authorized Tier1FX personnel are provided access to personally identifiable information, and these employees are required to treat this information as confidential. Despite these precautions, as you are aware internet communication, including email, is not secure. We cannot accept any responsibility for unauthorised access by a third party or for the loss, theft or modification of data while it is being transmitted to us by email.

### Concerns or Complaints

If you have any concerns or complaints about the Company's use of your personal information, please contact us at the email and/or address detailed below.

By email: [compliance@tier1fx.bm](mailto:compliance@tier1fx.bm)  
By post:  
Tier1FX (Bermuda) Limited  
Clarendon House  
2 Church Street  
Hamilton, HM 11  
Bermuda

### Changes to our Privacy Notice

The Company undertakes to keep this privacy notice under regular review. We reserve the right to update this privacy notice at any time and we will advise you when we make any substantial update to it.

### Disclaimer:

By using the Site, you consent to the collection, use, and storage of your information by us in the manner described in this Privacy Policy and elsewhere on the Site. We reserve the right to make changes to this Privacy Policy from time to time. We will alert you to any such changes by updating this Privacy Policy.

Our website contains links to other websites. This privacy notice, including the use of cookies, only applies to our websites: [www.tier1fx.bm](http://www.tier1fx.bm). When you use a link to another website you should read the privacy policy of that site.

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