

PRIVACY POLICY

Who we are

iCFD Limited is a member of the iFOREX group and it is registered as a Cypriot Investment Firm (CIF), regulated by the Cypriot Securities and Exchange Commission (CySEC) under license number 143/11.

Our commitment

This Privacy Policy explains how iCFD Limited operating under the brand name 'Vestle' (formerly known as "iFOREX") collects, processes and retains personal information about you (i.e. individuals). For the purposes of this Policy, the phrase "personal information" refers to any information relating to you which identifies you or you can be identified by it.

Vestle is committed to protecting the privacy of all personal information which is obtained from you. Vestle handles, retains and processes your information only insofar as this is in accordance with the applicable legal requirements and only to the extent it is necessary for the achievement of the purposes set out herein.

Vestle's contact details

Should you wish to contact Vestle with respect to any matter related to your personal information processed by Vestle and/or to the exercising of your rights under applicable law, please contact Vestle's DPO (Data Protection Officer) by email dpo@vestle.com, or by using the applicable form on the company's website, or by mail to iCFD Limited at Corner of Agiou Andreou & Venizelou Streets, Vashiotis Agiou Andreou Building, Second Floor, P.O.B 54216, Limassol, Cyprus.

Information Protection Supervisory Authority contact details

Vestle operates under the supervision of the Office of the Commissioner for Personal Information Protection ("OCPDP"). Should you wish to contact the OCPDP for any purpose, including for the exercise of your rights and/or lodging a complaint, please contact the OCPDP at 1 Iasonos Street, 1082 Nicosia, P.O. Box 23378, CY-1682 Nicosia, Tel. +357 22 818 456, Fax +357 22 304 565 or by e-mail: commissioner@dataprotection.gov.cy.

What information do we collect from you?

In order to provide you with our services we need to process certain information about you. We ask for information that will serve our legal and regulatory requirements, our business and legitimate interests, and information which enables us to offer and provide you with products and services tailored and customized to your interests and needs. Additionally, when you use our services we collect information from your use of our website, trading platform and

mobile app which helps us to better improve your experience when using our website and allows us to manage the services we provide.

We retain your full name, date of birth, place of birth, address, a certified photocopy of your national ID card, passport or other form of ID and a certified photocopy of a recent utility bill, or other proof of address, TICs (Tax Identification Codes), country of residence, geo location information, information related to your financial status, such as your bank account/s and Credit Card/s details or other means of payments, the origin of funds, annual income, deposits and withdrawals history, information in regards to funds and financial instruments kept by the Company on your behalf, occupation and information related to your knowledge and experience in the field of which Vestle provides services, relevant data and types of transactions conducted, documents downloaded and/or uploaded, phone number and email address.

We may also retain information such as how you use our website, trading platform and app, the frequency with which you access our website, trading platform and mobile app, site areas visited, pages viewed, frequency and duration of visits, Internet Protocol (IP) address, computers and cellular devices identification parameters, mouse clicks, mouse movements, scrolling activity as well as text you type in the website, trading platform and app, the website which referred you to ours or to which websites you link and your preferred languages.

The purposes for which we process personal information and the legal basis of it

1. Compliance with legal obligations

Vestle is required to collect, process and retain personal information of its clients in accordance with strict mandatory legal requirements, such as the Anti-Money Laundering law and financial regulations, in order to confirm your identity, the resource of your funds, to assess your suitability and appropriateness to receive the products and services we provide and in accordance, to categorize you as a client and to manage and administer the products and services that we provide you, and such information as required in order to ensure and evidence our compliance with our legal and regulatory obligations.

2. For the performance of the contract

(a) In order to provide you with the products and services that you have requested, including for processing transactions, for troubleshooting, to maintain and manage your account and personal profile, and in order to contact you when necessary and/or appropriate in relation to the products and services being provided to you, including via third parties.

(b) To enforce the Company's legal framework, i.e. the Company's governing terms and conditions ("**T&C**") as detailed in the Company's Client Agreement. Vestle process personal information in order to monitor if its clients use of the Company's products and services is in breach and/or is abusing the governing T&C, including with no limitation, in any case of dispute, or legal proceeding of any kind between Vestle's clients and Vestle, or between Vestle's clients, and other clients or third parties with respect to, or in relation with the services Vestle provides.

(c) For authentication and/or identity checks, including checks with credit reference agencies (who may keep a record of the information) for preventing fraud and for risk management purposes.

3. For the legitimate interests of Vestle

Vestle process personal information to enhance its business objectives, such as to keep our website, trading platform and mobile app safe and secure; to constantly optimize our products and services to existing and potential clients. This includes, but not limited to, developing better understanding of the products and services our clients and potential clients may be interested in obtaining and to tailor them in accordance; to measure and understand the effectiveness of advertising and to deliver most relevant advertising to clients and others; to improve our website, trading platform and mobile app to ensure that content is presented in the most effective manner; if applicable, to allow clients to participate in interactive features of our service, when they choose to do so; to conduct surveys and questionnaires and creating aggregated impersonalized and/or statistical information to this effect.

4. Marketing

Vestle uses personal information to keep its clients updated at all times in relation to matters such as contracts its clients have traded and activities of Vestle, for marketing purposes, including, but not limited to providing its clients with information regarding the products and services offered by Vestle and/or its partners. For marketing purposes Vestle will use means of newsletters, SMS (text) messages and/or any other electronic communications as may be applicable.

Should you wish to opt-out from receiving marketing services, at any time, please update your preferences on the company's trading platform or upload a request to Vestle.

Please note that opting out from marketing services (i) might affect your ability to explore new products and services and their customization to your needs and requirements, and (ii) will not prevent completely all forms

of communications to you, since Vestle is required by law to communicate and inform you of legal aspects related to the products and services provided to you by Vestle.

Automated decision – making and profiling

We use advanced automated decisions making tools in order to perform our duties, services and for KYC (know-your-client) and CDD (customer due diligence) purposes. Vestle is required by law to process personal information in order to (i) ensure Vestle services are not being used for money laundering and/or terrorist financing and/or fraud purposes; (ii) to establish its clients' suitability and appropriateness to receive Vestle's services; (iii) to assure Vestle is acting honestly, fairly and professionally and in the best interests of its clients (iv) in general to assure and evidence as appropriate that Vestle complies with its legal and regulatory obligations. Vestle also uses automated decision making and profiling mechanisms for marketing purposes and to customize its products and services to its clients, in order to ensure a more personalized, effective and efficient service.

How long will Vestle retain your personal information?

We will keep your personal information for as long as you are a customer of ours, and after you stop being one we will retain your information for the least amount of time necessary to fulfill our legal or regulatory obligations and for our business purposes.

We may retain Personal Information for longer periods than required by law if it is in our legitimate business interests and not prohibited by law or if we cannot delete it for technical reasons. We may also keep information for research or statistical purposes. If we do so, we will make sure that your privacy is always protected and only use it for those purposes.

The recipients of personal information

Access to personal information is restricted to those employees, partners, contractors, advisers, affiliates and service providers of Vestle (including, with no limitation, parent, sister and subsidiary companies in the iFOREX Group, credit reference agencies, fraud prevention agencies, companies we have a joint venture or agreement to co-operate with, market researchers and professional Advisors) who need to access such information for the purposes described in this policy. Those with access to personal information are obligated to comply with strict standards of confidentiality and protection of personal information and other information.

We may also share information with other third parties if we choose to sell, transfer, or merge parts of our business, or our assets or we may seek to acquire other businesses or merge with them. We will only share information with other parties if they agree to keep your information safe and private and which have sufficient guarantees that implement appropriate technical and organizational measures to ensure your rights.

We may share information with law enforcement agencies, information protection authorities, and other competent authorities as well as with other competent third parties, as may be required if Vestle believes that you performed any act or omission that Vestle believes to be violating any applicable law, rules, or regulations, or if Vestle is required, or believes that it is required by law to share or disclose your information to applicable authorities or to any other third party.

Transfer of information to third countries

Your personal information will be transferred by Vestle to its servers and/or servers of its affiliated companies and/or third party processors in the EEA (European Economic Area) and/or which some are located in non- EEA jurisdictions which are either approved by the European Commission by an Adequacy Decision and/or amongst others, where we enter into a contract with the recipient whose clauses are approved by our supervisory authority. We always take the appropriate measures to ensure that your personal information is properly secured.

Consequences of your refusal to provide us with personal information

Depending on the type of personal information in question and the grounds on which we may be processing, should you decline to provide us with personal information, for example as requested in the application form, we may not be able to open an account for you, to fulfil our contractual requirements or to provide you with any other services, information or assistance you have sought, or evaluate the appropriateness of the service you are requesting or may not be able to continue with our relationship.

Your rights

At any point in time when we possess or process your personal information, you have the following rights:

Right to Access

You may have access at any time to your personal information which Vestle processes as well as ask us to confirm to you whether or not we process your personal information. Before providing access to you, we will ask you to prove your identity and give us sufficient information about your interaction with us so that we can locate any relevant data.

If we provide you with access to the information we hold about you, we will not charge you for this unless your requests are manifestly unfounded or excessive, i.e. requests are manifestly abusive, based on unreasonable intervals or their number or repetitive or systematic nature. If you request further copies of this information from us, we may charge you a reasonable administrative fee.

Right of portability

You have the right to ask Vestle to provide you with the personal information you have provided us in a commonly used machine-readable format.

Right of Rectification

Where applicable you may ask Vestle to rectify inaccurate personal information or (taking into account the purposes of the processing) to complete incomplete personal information concerning you. The completion and/or rectifying of information may require you to provide Vestle with supplementary statements and/or documents.

Right to Restriction of Processing

You have a right to ask Vestle to restrict the processing of your personal information, based on the following grounds:

- The accuracy of your personal information is questioned by you.
- The processing is unlawful and you oppose the erasure of the personal data.
- You have objected to processing but you are waiting for us to tell you if we are allowed to keep on using it.
- It is not relevant any more, but you want us to keep it for use in legal claims.

In such cases the processing of your personal information might be restricted except to the extent of Vestle's legal and/or regulatory requirements of processing information and/or Vestle's right for the establishment, exercise or defense of legal claims.

Please note that restricting the processing of your personal information may adversely impair Vestle's ability to provide you with any of the products and services you may have requested.

Right to object and right to opt out

You may object on grounds relating to your particular situation, to the processing of your personal information and for profiling which is based on the ground of our legitimate interest. You may choose not be subject to a decision based solely on automated processing and profiling.

Subject to exceptions, Vestle will stop processing your personal information except to the extent that Vestle (i) won't be able to perform and/or provide its duties and/or services; (ii) is required to process your personal information for regulatory and/or legal purposes; (iii) is required to maintain adequate business records or maintain adequate records for Vestle's right for the establishment, exercise or defense of legal claims.

Please note that objecting and/or opting – out may adversely affect Vestle's ability to provide you with any of the services you have requested.

Right of erasure

You may ask Vestle to erase your personal information based on the following grounds:

- The personal information is no longer necessary for the purposes for which it was collected and/or processed.
- Where the processing of information is based solely on your consent and you have withdrawal your consent to it.
- Where you have objected to the processing of personal information and where Vestle do not have legitimate grounds for further processing.
- The processing of personal information is unlawful.
- There should be compliance with Union or Member State law which requires such action.

Please note, should you request that Vestle erase your personal information, Vestle will no longer be able to provide you with any of its services.

Vestle will erase your personal information except to the extent that Vestle is required (i) to hold your personal information for regulatory and/or legal purposes, (ii) to maintain adequate business records and adequate records for Vestle's right for the establishment, exercise or defense of legal claims.

Right of notification

You have a right to be notified by Vestle in case of an information breach which has an adverse effect on your personal information.

Cookies

What are cookies?

Cookies are used by nearly all websites. They are small text files placed on your device when you visit or using our website (for the purpose of this Cookies notice Website shall also means our trading platform and mobile app) which enables our systems to recognize your device and help us to provide you with better, faster, safer and customized experience, including for advertising and marketing purposes.

We use cookies to analyze traffic on our website, to track your activity and to help ensure you get the smoothest possible experience when visiting our website. The information collected using cookies enables us to ensure we present you with options tailored to your preferences on your next visit and to enhance the experience of our services on the website.

Cookies do not harm your device, they are not computer programs, can't be executed as code and cannot be used to disseminate viruses. They can only contain and transfer as much information as the users themselves have disclosed to a website.

By using our website, you agree that we can place the following types of cookies on your device. Should you wish to check, change, block or delete some and/or all of the cookies this can be managed and controlled within your browser settings. For more information on how to do this please read below the “How to control your cookies”.

Types of cookies we use

Session cookies

Session cookies last only for the duration of your visit and are deleted when you close your browser. They usually store an anonymous session ID allowing you to browse a website without having to log in to each page but they do not collect any information from your computer. They facilitate tasks such as allowing a website to identify that a user of a particular device is navigating from one page to another, supporting website security or basic functionalities.

Persistent cookies

Persistent cookies last after you have closed your browser, and allow us to remember your actions and preferences and help us to understand how you arrive and use our website so we can better improve our services. They can be used to provide information about numbers of visitors, the average time spent on a particular page and generally the performance of the website. Sometimes persistent cookies are used to provide targeted advertising based on the browsing history of the device.

First and third party cookies

Vestle is the trading name of iCFD Limited, authorized and regulated by CySEC under license # 143/11.

Corner of Agiou Andreou & Venizelou Streets, Vashiotis Agiou Andreou Building,
Second Floor, P.O.B. 54216, Limassol, Cyprus

Tel: +35725204600 | Fax: +35725204607 | www.vestle.com

First party cookies are those set by or on behalf of the website visited. All other cookies are third party cookies. We use both first party and third party cookies.

Strictly necessary cookies

Cookies which are essential to enable you to use our website and use its features, and for ensuring the security of our services. Without these cookies our services can't be provided. These cookies do not gather information about you that could be used for marketing or remembering where you visited while browsing the internet.

Performance cookies

Cookies which collect information about your use of our website, for example which pages you visited most often. They don't collect information that identifies you, although they may collect the IP address of the device used to access the site. The information is anonymous and is used to improve the website's performance, the user's experience and for advertising optimization purposes.

Functionality cookies

These cookies allow our website to remember choices you make such as your user name, language or your region and provide enhanced features. They may also be used to provide services you request, such as watching a video and can also be used to remember changes you have made to text size, font and other parts of web pages that you can customize. The information collected is anonymized (i.e. does not contain information by which an individual can be identified) and does not track your browsing activity across other websites.

Targeting cookies

Cookies which collect several pieces of information about your browsing habits. They are usually placed by advertising networks. They remember that you have visited a website and this information is shared with other organizations such as media publishers. These organizations do this in order to provide you with targeted adverts more relevant to you and your interests.

Cookie name	Description
__lc.visitor_id.nnnnnnnn	Third party, functionality persistent cookie. Allows to contact visitors while using the website and to recognize returning visitors to the website. For more information please visit https://www.livechatinc.com/privacy-policy/ .
TS[HHHHHHHH]	A session, first party cookie, serves for verification and authentication of users' requests.

__qca, mc	Persistent, third party cookies provided by Quantcast, used for targeting and traffic measurement purposes. For more information please visit https://www.quantcast.com/faq/quantcast-services/ .
__utma, _utmb, _utmc, _utmv, _utmz, _px, _ga, _gid	Google analytics cookies, primarily used to track visits to any site which uses Google analytics. These cookie store information such as the number of visits made from your device and the duration; record custom variables for segmentation, explain how you have reached our website and measure website’s traffic. These cookies do not contain any personal information other than the IP address of your device. For more information please visit Google at https://developers.google.com/analytics/devguides/collection/analyticsjs/cookie-usage .
_hjIncludedInSample	Third party, session cookie, provided by Hotjar, used for testing operations funnels. For more information please visit https://www.hotjar.com/legal/policies/cookie-information .
eft	A performance, first party persistent cookie, enabling to provide the website’s users relevant content in accordance to their preferences.
Geoip	A session first party cookie, validating the country of the IP address in use. This cookie does not contain any personal information other than the IP address of users’ device.
has_js	A performance, first party session cookie, validating whether users’ browsers support JavaScripts.
hplang	A functionality, first party session cookie, enabling presenting the website in the user’s preferred language.
Snap	Performance and functionality, third party persistent cookies, supporting the website’s chat box capabilities. No personal information is collected apart from the users’ email address, which are provided by the users themselves. For more information please visit https://help.snapengage.com/live-chat-cookies/ .

<p>Social media</p>	<p>We use Facebook, LinkedIn, twitter and Snapchat remarketing services to advertise our content, products and services. For more information about these cookies and on how to manage them please visit:</p> <p>Facebook at https://www.facebook.com/policies/cookies/</p> <p>LinkedIn at https://www.linkedin.com/legal/cookie-policy?trk=hp-cookies</p> <p>Twitter at https://help.twitter.com/en/rules-and-policies/twitter-cookies#</p> <p>Snapchat at https://www.snap.com/en-US/cookie-policy/</p>
<p>Google Adwords</p>	<p>We use the Google AdWords remarketing service to advertise our products and services on other websites to previous visitors to our website. This could be in the form of an advertisement on the Google search results page, or a site in the Google Display Network. The Cookies are valid for 30 days from creation. This is a third party cookie. For more information please visit Google's Ads Settings at https://adssettings.google.com.</p>
<p>logglytrackingssession</p>	<p>A functionality, third party session cookie, used for debugging and troubleshoot purposes. For more information please visit https://www.solarwinds.com/cookies.</p>
<p>VWO</p>	<p>A functionality third party cookie, used for website's performance measurement and optimization. For more information please visit https://vwo.com/knowledge/what-are-the-cookies-stored-by-vwo/.</p>
<p>emerp</p>	<p>First party cookies, persistent until being deleted by the user. Used for purposes of marketing tracking, synchronization and optimization. No personal information is collected apart for users' email address which being provided by the users themselves once they register to receive the Company's services and products.</p>
<p>aspxroles</p>	<p>A session, performance and functionality first party cookie, enables users to perform authorized functions.</p>

Cs; B; db; version; MinDealGroupId; sd	Persistent, strictly necessary and performance first party cookies, enabling static content routing parameters to improve performance.
ASP.NET_SessionId	A strictly necessary, performance and functionality, session first party cookie, used for keeping users logged in while in session.
cdn	A performance, persistent first party cookie, enables to base URL for static content to improve performance.
db	A strictly necessary, persistent, first party cookie, allows to provide users with relevant texts and images.
FXnetWeb	A persistent, strictly necessary, functionality, first party cookie, creating authentication token to improve Functionality.
hideMultipleDealsCloseAlert	A persistent, functionality first party cookie, used for saving users preferences for improving services functionality.
IsCSMPush	A functionality, persistent first party cookie, for the purpose of testing operation to improve services functionality.
JWT-Authority	A persistent, functionality first party cookie, used for registration purposes from mobile devices.
Language, LID	A functionality, strictly necessary persistent first party cookies, used for saving users preferences to improve services functionality.
LoginReason	A persistent first party cookie, used for troubleshooting purposes.
NativeUnknownApp, NativeIosApp, NativeAndroidApp	Persistent, first party cookies, used for optimizing purposes of the trading platform over mobile devices.
RmData	A persistent, performance and functionality first party cookie, used as authentication token to improve Functionality and performance.

RememberMe	A persistent, performance and functionality first party cookie used for the maintenance of users preferences to improve functionality and performance.
UserDeviceInformation; ViewMode	Persistent, strictly necessary first party cookies, used for mobile UI support.
Csmg	A strictly necessary, performance and functionality first party cookie used for keeping users logged in to the system.
FXNET_SessionId	A persistent, strictly necessary first party cookie, used as server session identifier for keeping users logged in.

Please note that:

- Some of our services will not function if your browser does not accept cookies.
- Where a cookie is a third party cookie please visit the providers’ website for more information.
- Unless mentioned otherwise on the description column no personal information is collected.
- The above information is subject to changes from time to time.

How to control your cookies

Most web browsers will accept cookies but if you would rather we didn’t collect information in this way you can always choose to accept all or some, or reject cookies in your browser's settings. However, rejecting all cookies means that you may not be able to take full advantage of some or all of our website's features.

You can manage your cookies set by any website through the browser settings on each browser you use, on each device you use to access our website, and you can also allow cookies from specific websites only by making them “trusted websites” in your Internet browser.

Should you wish not to receive cookies that are not strictly necessary to perform basic features of our website, you may choose to opt-out by changing your browser settings. For more information generally on cookies, including how to disable them, please refer to <https://www.aboutcookies.org/>.

Links

When you use the Vestle website, you may be able to link to third party websites or apps. This Privacy Policy does not apply to nor endorse those third party sites or apps, and Vestle is not responsible for any personal information collected and/or processed and/or shared by third parties via those other websites or apps.

Third party sites or apps which have links to Vestle will govern the use of personal information you submit to them, which may also be collected by cookies when you visit or use them. We do not endorse nor accept any responsibility and/or liability for the privacy practices of such third parties. Other websites and apps have separate and independent privacy policies and therefore we highly recommend you to review the policies and regulations of each site and app you visit before submitting your personal information.

Security

Vestle makes efforts to maintain appropriate safeguards in order to ensure that the security, integrity and privacy of the personal information that you have provided is not misused. Such measures and safeguards include encryption during information transmission, strong authentication mechanisms and the separation of machines and information to provide secure areas. While such systems and procedures significantly reduce the risk of security breaches and the inappropriate use of personal information, they do not provide absolute security. Vestle will review regularly its security measures in order to effectively eliminate the likelihood of any form of misuse where necessary.

Amendments to policy

Vestle may change and update the terms of this Privacy from time to time. All changes will take effect seven (7) days after their initial posting on the Website, unless Vestle amends the Privacy Policy to comply with legal or regulatory requirements. In the latter cases the amendments will become effective as required, or ordered.

Governing Law

In respect of issues not addressed in the present Privacy Policy, the law of Cyprus will apply and the competent court for the settlement of any dispute which may arise in respect of this privacy policy shall be the District Court of the district in which the Company's headquarters are located.