

# To Markets

## PRIVACY POLICY

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## 1. Introduction

This Privacy Policy is between you (clients/potential clients, website visitors and employees) and TO MARKETS PTY LTD ("To Markets"). As part of our daily business operations, To Markets need to collect personal information from our clients and prospective clients in order to provide them with our products and services and ensure that we can meet their needs when providing these products and services as well as when providing them with the respective information.

Your privacy is of the most importance to us and it is our policy to safeguard and respect the confidentiality of information and the privacy of individuals. Our Privacy Policy is reviewed regularly to ensure that any new obligations and technologies, changes to our business operations and practices are taken into consideration, as well as that it remains abreast of the changing regulatory environment. Any personal information we hold will be governed by our most recent Privacy Policy.

The scope of this Privacy Policy is to provide you with information of how To Markets collects and uses information through its site [www.tofx.com](http://www.tofx.com). It does not apply to websites operated by any other organisations and/or other third parties. By registering with, or accessing the To Markets website, you consent to the collection, use and processing of your personal data.

To Markets respects the privacy of any user that accesses its website(s). We are therefore committed in taking all reasonable steps in safeguarding the personal data of any existing or prospective clients, applicants and visitors.

## 2. Information We Collect

When you open an account with To Markets, it is necessary that we collect some personal data from you for business purposes. By completing this application form, you are requested to disclose personal information in order to enable the Company to assess your application and comply with the relevant rules and regulations. The information you provide may also be used by the Company to inform you regarding its services.

The information that we may collect from you includes the following:

- ✓ name;
- ✓ address;
- ✓ contact details;
- ✓ date of birth;
- ✓ employment details;
- ✓ bank account details;
- ✓ trading history;
- ✓ trading account balances, trading activity;
- ✓ identification information (such as passport, utility bills or drivers' licences) required to be collected and verified in accordance with the Anti-Money Laundering and Counter Terrorism Financing Act 2006;
- ✓ IP address, browser type, operating system, Internet service provider (ISP), cookies;
- ✓ credit information (if expressly authorised by the individual);
- ✓ and any other information that is relevant to the services that we provide.

### 3. Whom Do We Collect Personal Information

The personal information we may collect and hold includes (but is not limited to) personal information about the following individuals:

- ✓ clients;
- ✓ potential clients;
- ✓ introducing brokers, affiliates and money managers;
- ✓ service providers or suppliers;
- ✓ prospective employees, employees and contractors; and
- ✓ other third parties with whom we come into contact.
- ✓ If necessary, we will also collect information about individuals such as:
  - ✓ trustees;
  - ✓ partners of legal partnerships;
  - ✓ company directors and officeholders;
  - ✓ agents nominated by the individual; and
  - ✓ other third parties dealing with us on a ‘one-off’ basis.

### 4. Use of Personal Information

The following list illustrates the reasons why To Markets may need to use your Personal information:

- ✓ to verify your identity;
- ✓ to ensure that you meet the suitability requirements needed to use our products and services;
- ✓ to manage the account you have with us;
- ✓ to process your transactions;
- ✓ to send you information about transaction/post-transaction services;

- ✓ to keep you updated with news on our products, services and any other information relevant to your working relationship with To Markets;
- ✓ for website improvement purposes;
- ✓ for the analysis of statistical data which will help us provide you with better products and services in the future.

## 5. Legal Obligations

We may be required to retain and use personal information to meet our legal requirements, for data security purposes and as we believe to be necessary or appropriate in order to:

- (a) comply with our obligations under applicable law and regulations;
- (b) respond to requests from courts, law enforcement agencies, regulatory agencies, and other public and government authorities;
- (c) monitor compliance with and enforce our Platform terms and conditions;
- (d) carry out antimoney laundering, sanctions or KYC checks as required by applicable laws and regulations; or
- (e) protect our rights, privacy, safety, property, or those of other persons.

We may also be required to use and retain personal data after you have closed your To Markets account for legal, regulatory and compliance reasons, such as the prevention, detection or investigation of a crime; loss prevention; or fraud prevention.

## 6. Disclosure of Your Personal Information

We disclose and/or share your personal data when necessary to provide our services or conduct our business operations. When we share personal data, we do so in accordance with applicable data privacy laws and our internal security standards. We do not sell personal data or client database we collect. We do not distribute or transfer any data of our clients to any unauthorized or non-affiliated to it, third parties.

Below are the parties with whom we may disclose and/or share personal data:

a. Within To Markets group of Companies:

The Company is part of the To Markets group of Companies (“To Markets group”). In order to meet our contractual obligations to you, the Company is supported by To Markets group

employees and contractors. For the provision of services, we may make personal data available to them if necessary. All of our employees and contractors are required to follow our data privacy and security policies when handling personal data.

b. Our third-party providers:

The Company is supported by third party providers/service providers. We may disclose data to our service providers that we do business with if necessary. In those cases, we retain confidentiality agreements, and any data we may disclose is always on a “need to know” basis, and solely for the provision of our services to you. Such services may include cooperation with financial institutions, such as banks and payments processing providers, promotional functions, direct marketing services, software system and platform support, cloud hosting services, advertising (including affiliate advertising), data analytics.

c. Regulatory disclosure:

We will also share and/or disclose personal data if we believe it is required, to third parties for legal reasons in order to comply with legal obligations, including but not limited to law enforcement and other public authorities.

## **7. Security**

Your security and data protection is of utmost importance to us. All information you provide to us is stored on our secure servers, where it is protected by our comprehensive, modern, and well-maintained data security infrastructure. We protect your information by using data security technology that includes, but is not limited to such systems as firewalls, encryption, access controls; physical security; physical and logical network separation; technology audit tools; and appropriately administered and monitored internal roles and procedures.

Unfortunately, the transmission of information via the Internet is not completely secure. We will take all steps reasonably necessary to ensure that your personal data is kept secure and protected in accordance with our legal obligations and standards. If this is not possible, for example because we are required by law to disclose data, we will ensure that the sharing of the data is lawful.

## **8. Cookies**



Once a client visits our web site [www.ToMarkets.com](http://www.ToMarkets.com), campaign and advertising cookies will be placed in a client's device so that we can track the client, measure advertising outcome along with recording client interest. Our marketing and advertising partners including Google, Marketo, Hotjar, Taboola and more enables us to record client interest on products, client tracking and conversions. Cookies used by us and our partners do not collect personal information such as name, email, address or phone number. Clients can disable cookies from their browser however we encourage them to keep cookies enabled for a better site experience and to receive targeted materials from us.

## **9. Marketing**

We may collect personal Information through social media sites when you interact with us on one of our social channels, via our Apps or/and from other sources, such as public databases; joint marketing partners; social media platforms; from people with whom you are connected on social media platforms, as well as from other third parties.

We may send you information by SMS, push notification, email, in-app notification or contact you by telephone or by any other means to provide you with information about our products, services, training and offers we think would be of interest to you. If you receive email communications from us about the market or your activity on the platform and don't want to in the future, you may opt out by clicking the unsubscribe link situated at the end of each email sent to you or by notifying the member of staff that contacted you and we will stop sending you this information.

## **10. Queries**

If you have any questions which have not been covered in this Privacy Policy, or any further concerns regarding the use of Personal Data, please do not hesitate to contact us through email at [support@tofx.com](mailto:support@tofx.com).