

# **Privacy Policy**



#### Introduction

Protection of our clients privacy and personal and financial

This Privacy Policy shall define the rules and purposes for processing Headway clients' personal data together with actions Headway employs to protect this data from unauthorized access by third parties. The company affirms its commitment to laws on Privacy, data protection and data security.

## **Purpose**

The purpose of the Privacy Policy is to (Outline) determine what data or information the Company may collect, with whom the company could share this information and the usage of it in general. By registering on the Company's website, you agree on the data collection, usage and processing. We collect, use, store, possess and disclose the personal data of clients for the performance of our services as required by law.

## **Collecting personal data**

- 1- By registering in the company's website(s) and platform(s), you agree to have your personal data processed and specifically consent to the collection, systemization, aggregation, storage, revision (updating, changing), usage, anonymization, blocking, deletion, and distribution (transfer) of said personal data to third parties in accordance with the conditions set forth in this Privacy Agreement.
- 2- We ask you for the necessary data while registering a Personal Area, providing functional service. Providing this data is required for client identification and we may also collect data to improve our understanding of your needs and preferences by communicating through Live Chat. Please note that you provide this data to us voluntarily
- 3- We use the data that you directly provide when communicating. If you do not want your personal information to be collected, please do not submit it.
- 4- The information that we may collect from you includes the following:
  - full name, residential address and contact details (e.g., email address, telephone number, fax etc.);
  - date of birth, place of birth, gender, citizenship;
  - information about your income and wealth, including details about your and source of funds, assets and liabilities, bank account information, trading statements, FATCA and CRS information and financial statements;



- trading account balances, trading activity, your inquiries and our responses;
- information on whether you hold a prominent public function (PEPs);
- profession and employment details;
- authentication data (e.g., signature)
- location data;
- trading performance, knowledge and experience;
- verification information, which includes information necessary to verify your identity such as a
  passport or driver's license (examples also include background information we receive about you
  from public records or from other entities not affiliated with us); furthermore, we may collect other
  identifiable information such as identification numbers and/or Passport/Tax registration numbers;
- any other information customarily used to identify you and about your trading experience which is relevant to us providing our services to you;
- activity and movement on the website.

#### **Disclosure of Your Personal Information**

The Company shall not disclose any of its clients' confidential information to a third party, except:

- 1- to the extent that it is required to do so pursuant to any applicable laws, rules and/or regulations;
- 2- if there is a duty to the public to disclose;
- 3- if our legitimate business interests require disclosure;
- 4- at your request or with your consent or to any one authorized by you.

As part of this policy, The Company disclose your personal information to the following:

- 1- Our regulator and all regulatorary companies and governmental bodies that the Company is required to disclose information to.
- 2- Service providers (for business purposes), including third parties such as business service providers and specialist advisers who have been contracted to provide us with administrative, financial, legal, tax, compliance, insurance, research or other services;
- 3- payment service providers (PSPs) and/or banking institutions in relation to issues raised regarding deposits/withdrawals to/from trading account(s) held with the Company.
- 4- business parties, credit providers, courts, tribunals and regulatory authorities as agreed or authorized by law;
- 5- business introducers with whom we have a mutual business relationship;
- 6- anyone authorized by you.



# How does the Company use your information

The Company may use your for one or more from the following proposes::

- 1- To confirm your identity.
- 2- To maintain your personal profile.
- 3- To contact you when necessary or appropriate in relation to the services being provided to you.
- 4- To provide you with information about our products and services and provide you with information or opportunities that we believe might be relevant for you.
- 5- To tailor the website or other service we provide to you relating to your needs and interests; and to create anonymous statistical data.
- 6- When you access the company's website(s), we may automatically (i.e., not necessarily with registration) collect statistical information that is not personally identifiable (e.g., type of internet browser and computer operating system used; domain name of the website you come from; number of visits, average time spent, pages viewed, etc.). The Company may use this information and share it within the Company's group for statistical reasons (i.e. measure the use of its website and/or improve its content).

### Use of cookies

- 1- We use cookies to ensure that our website works effectively and to support your trading activities. Cookies are small text files sent from our web server to your computer. Our cookies do not contain any personal data, account numbers, or passwords.
- 2 We may enlist outside organizations to help us manage the website and collect and analyze statistical data. These outside organizations may install and use their own cookies on our behalf.

Note: Occasionally, we may update the Privacy Agreement and immediately post the new version to our website. We recommend that you periodically read this Agreement in order to always have the latest information concerning how your personal data is processed.

