



**AGILITYFOREX**  
INTERNATIONAL PAYMENTS

# Privacy Policy

May 23rd 2018

Your privacy is very important to us and we are committed to ensuring that your personal information is kept confidential, safe and secure. We will in this Privacy Policy describe the collection, usage, storage and sharing practices of personal data. Moreover, this policy will also outline how we manage the information provided by you or a third party following the provision of our services to you. This notice will also specify your rights as a client, concerning our processing of your data.

This privacy policy sets out how we use and secure personal information under the privacy principles contained in the Personal Information Protection and Electronics Document Act (PIPEDA) of Canada, or by substantially similar provincial legislation as well as other data protection regulations such as General Data Protection Regulation (GDPR). Agility Forex conforms to PIPEDA and other legislation.

We set a high standard of information security. Our aim is to protect the confidentiality, integrity and availability of Agility Forex Ltd. and our customer information and as such we implement a range of physical, technical and administrative security measures to maintain the safety of your personal information.

We will review our privacy policy from time to time to reflect changes to our operations and practices, new regulatory obligations and advancing technology.

## WHAT PERSONAL DATA WE COLLECT

Personal data will in most cases be collected directly from you or generated as part of the use of our services and products. We may require additional information to keep your account up to date or to verify the information we collect. We group your personal information into the following categories:

- **Identification information:** Name, date of birth, address and national identification number. As a financial institution, we are required to collect and document such information; we do this in the form of copies of your passport or driver's license.
- **Contact information:** phone numbers and addresses, this also includes postal addresses and your email address.
- **Financial information:** transactional data, credit file history, financial accounts
- **Information related to legal requirements:** customer due diligence and anti-money laundering requirements.

## WHY DO WE COLLECT YOUR PERSONAL INFORMATION AND HOW DO WE USE THEM?

To verify, establish and manage your account

To provide you with our services we need to verify your identity and to prevent and detect fraud and other crimes. Moreover, we need your details to manage your account efficiently, providing you with a more personalized experience, as well as documenting, administering and completing tasks for the performance of contracts or to respond to your instructions, inquiries, and complaints.

We may also contact your bank to verify your banking information and any other information relevant to your account and our services where necessary. We may need to process your data to satisfy legal and regulatory obligations. As part of this process we refer to your credit file to identify you. To be clear we do not need or perform a credit check we are only verifying your identity. Our reading of the file has no bearing or impact on your credit score. Agility Forex Ltd. uses the services of third party providers to assist with client identity verification, client management and financial transaction reporting. Agility Forex only chooses third parties who adhere to highest standards with regard to client privacy and security. These third parties may change from time to time as AFL constantly work to optimize its offerings.

To provide our products and services, or information about our products and services, and serve you better

The information we maintain needs to be kept up to date to manage our obligations to you. By having this data up to date allows us to better service your needs and maintain regulatory compliance. We may use your data to keep in contact with you, to market new services or products to you, and to let you know of changes to our service and terms and conditions.

## **TO PROVIDE REFERENCES ABOUT YOU**

We may share your data, under the consent you provide, with others such as our suppliers, payment service providers, and business partners. We will, however, always make sure that we respect the relevant financial industry privacy obligations before sharing. Moreover, to fulfill services and agreements, we may have to disclose information about you. For instance, we may provide your personal information to our intermediary bankers or international intermediaries that require it or may request it to complete the transaction on your behalf, or any partners, agents or intermediaries who are a necessary part of the provision of our products and services. We may also use your information to guide us on new products that may be relevant to you.

Agility Forex limits its collection of personal data to that laid out in this privacy policy. No data is collected other than that which is reasonably needed to fulfil our own obligations and none is transferred, save and accept in the event of a corporate restructuring, merger or takeover, which would be communicated in advance.

## **TO SATISFY ANY LEGAL OBLIGATIONS OR REGULATORY REQUIREMENTS**

We collect your data because, as a financial service provider, we have a legal obligation to identify you and keep certain records about you. We may need to use your personal information to comply with our legal obligations or to comply with requests from applicable legal or regulatory authorities.

## **TO INVESTIGATE AND SETTLE INQUIRIES/DISPUTES**

To investigate or resolve inquiries or disputes with you, we may need to use the personal information collected from you to do so. We do this to guarantee that any inquiries or disputes are investigated, resolved and settled quickly and efficiently.

## **CONSENT**

Under the terms and conditions of the Agility Forex service agreement you have consented to allow Agility Forex to use your data in the manner and under the terms laid out in this Privacy policy. That consent is freely given, specific, informed and unambiguous. You understand how your data is collected, utilized and by whom as laid out above. You are giving your consent to each of the various uses of your data Agility Forex needs to offer you its services. Further you understand that we manage your privacy on the basis of the principles laid out under PIPEDA as well as other regulatory frameworks.

Additionally you understand that we use your data under two legal bases: your specific consent as laid out above and under the legal basis, which speaks to AFL's legal and regulatory responsibility to utilize your data to satisfy its legal requirements.

## **RECORD KEEPING**

We have to keep records of your personal information and transactional data in order to comply with legal and regulatory requirements. This may refer to any communication we have with you. You consent to the electronic recording of telephone conversations without a warning message being given and that we may use the records as evidence in any dispute that may arise between us.

## **DATA ANALYSIS AND COOKIES**

We may collect information online through the use of "cookies." A "cookie" is a small piece of information/text sent by a web server to be stored on a user's web browser, so it can later be read back from that browser on subsequent visits to a website. We use cookies to store visitors' preferences and to record session information which allows us to customize our website for you as you visit various components of [www.agilityforex.com](http://www.agilityforex.com).

We do not link the information we store in cookies to any personal information you provide while on our site. You may be able to configure your browser to accept or reject all or some cookies, or to notify you when a cookie is set, however, cookies must be enabled to access most functions on the site. Since each browser is different, please check the "Help" menu of your browser to learn how to change your cookie preferences.

We also use web technologies to track usage data such as the source address that a page request is coming from, your IP address or domain name, the date and time of the page request, the referring Web site (if any) and other parameters in the URL. We use this data to better understand aggregated website usage and improve your user experience.

## LOG FILES

The service uses log files. Stored information includes IP addresses, browser type, Internet service provider (ISP), referring/exit pages, platform type, date/time stamps and number of clicks. This information is used to analyze trends, administer, secure and protect services, which in aggregate allow us to enhance service.

## EU RESIDENTS RIGHTS

If you reside within the European Union, you have the right to access, rectify, download or erase (where applicable) your information as well as the right to restrict and object to certain processing of your information. While some of these rights apply generally, certain rights only apply under specific circumstances. We describe these rights below:

### ACCESS AND PORTING:

You can see your personal and transactional data on your account by logging in. You have a right to a copy of your data and supplementary information we hold about you if this does not contradict legal requirements, and the rights and freedom of others. Your data can be ported out on request in machine-readable format.

### RECTIFY, RESTRICT, LIMIT, DELETE

You can also request to rectify, restrict, limit or delete much of your information from your account.

**Rectify:** You can request or can themselves rectify inaccurate or incomplete data

**Restrict:** You can request restriction of the use of their data.

**Delete:** You can request the deletion of their personal data. In some instances data needs to be maintained for a longer period in order to comply with ongoing reporting and record keeping requirements.

**Objection:** You can always object to the processing of your personal data. In such cases we will cease to process your information unless we have compelling legitimate grounds to continue to process them or where processing is needed for legal/compliance reasons.

## REVOKE CONSENT

When you have previously provided your consent, such as to permit us to process your data, you have the right to withdraw that consent at any time, although we may still need to process that information even after consent has been revoked if we have a legal or regulatory requirement to do so.

## COMPLAIN

Should you wish to raise a concern about our use of your information (without prejudice to any other rights) you have the right to do so with your local supervisory authority.

All of the above require a request in writing by letter with photo identity to process. Additionally while these terms are applicable to EU residents they will not be unreasonably withheld from any other customer subject to legal and regulatory requirements of other jurisdictions. All enquiries and requests from a client will be answered as soon as is reasonably possible and no later than 30 days from receipt.

## **RETENTION OF INFORMATION**

We retain information as long as it is necessary to provide services to you and others, subject to any legal obligations to further retain such information. Information associated with your account will generally be kept until it is no longer necessary to provide the services or until you ask us to delete it or your account is deleted which ever comes first. Following the deletion of your account it may take 30 days to fully delete the personal information and system logs from our system. We may retain information from deleted accounts in order to satisfy regulatory and legal requirements, prevent fraud, collect fees, resolve disputes, troubleshoot problems, assist with investigations, enforce the terms of service and other actions either permitted by or required by our legal and regulatory obligations. The information we retain will be handled in accordance with this Privacy policy.

## **CONTACT US**

You can always contact us with any questions or concerns regarding our privacy policy by either sending a message to: [privacy@agilityforex.com](mailto:privacy@agilityforex.com), or by writing a letter to: Agility Forex Ltd, Suite 1507, 885 W Georgia St, Vancouver, BC V6C 3E8, Canada. Attn: Privacy Officer/Data Protection.