



**HOLIWAY INVESTMENTS LTD** (hereinafter the “**Company**”) and its related entities, it is responsible for the protection of the privacy and the safeguarding of clients’ personal and financial information. By opening a trading account with the Company, the client hereby gives its consent to such collection, processing, storage and use of personal information by the Company as explained below.

### **The collection of personal information**

The Company collects the necessary information required to open a client’s trading account, perform transactions and safeguard the clients’ assets and privacy and to provide clients with the services they require. In this respect, the Company gathers information from clients and may, in certain circumstances, gather information from banks and/or credit agencies, and/or clearing agencies and/ or other sources which will help the Company to construct the clients’ profile based on their requirements and preferences in order to provide its services effectively.

The information the Company collects includes information required to communicate with and identify its clients. The Company may also collect certain demographic information, including, birth date, education, occupation, etc. The Company also assesses trading related information.

With regards to each of your visits to our site, we may, automatically collect information including internet protocol (IP) address, login information, browser type and version, time zone, phone numbers used to call our customer service number. We may receive information about you from third parties, for instance business partners, sub-contractors, advertising networks, analytics providers, search information providers, credit reference agencies.

Supervisory monitoring, is essential part of our business. In order to ensure the proper provision of our services and in order to be compliant with the MiFID II Directive and CySEC Regulations, our company is required to monitor and record all phone calls.

There are a number of legal obligations imposed by relevant laws to which we are subject, as well as specific statutory requirements (e.g. anti-money laundering laws, financial services laws, corporation laws, privacy laws and tax laws). There are also various supervisory authorities whose laws and regulations apply to us. Such obligations and requirements impose on us necessary personal data processing activities for credit checks, identity verification, payment processing, compliance with court orders, tax law or other reporting obligations and anti-money laundering controls.

These obligations apply at various times, including client on-boarding/acceptance, payments and systemic checks for risk management.

In addition, our Live Chat is monitored and recorded as well for the same reasons.

Your continued participation in both telephone and chat communication serves as express consent to be monitored or recorded.

### **Usage of personal information**

The Company uses clients’ personal information only as required to provide quality service and security to its clients. This information helps the Company to improve its services, customize browsing experience and



enables it to inform its clients of additional products, services or promotions relevant to clients and in this respect the clients hereby consent to the usage of this data for such purposes.

We process personal data so as to safeguard the legitimate interests pursued by us or by a third party. A legitimate interest is when we have a business or commercial reason to use your information. Despite that, it must not unfairly go against what is right and best for you. Examples of such processing activities include the following:

- initiating legal claims and preparing our defence in litigation procedures;
- means and processes we undertake to provide for the Company's IT and system security, preventing potential crime, asset security, admittance controls and anti-trespassing measures;
- setting up CCTV systems (e.g. at our premises for security reasons);
- measures to manage business and for further developing products and services;
- sharing your personal data within HWFX for the purpose of updating/verifying your personal data in accordance with the relevant anti-money laundering compliance framework;
- risk management.

### **You have provided your consent**

Our storage and use of your personal data is based on your consent (other than for the reasons described or implied in this policy when your consent is not required). You may revoke consent at any time; however, any processing of personal data prior to the receipt of your revocation will not be affected.

If the clients do not want to receive information of this nature for any reason, they can contact the Company at the following address: [support@hwfx.com](mailto:support@hwfx.com)

### **Protection of personal information**

Holiway Investments Ltd, is registered with the Office of the Commissioner for Personal Data Protection of the Republic of Cyprus; therefore, any clients' personal data is kept by Holiway Investments Ltd, according to the Processing of Personal Data (Protection of Individual) Law of 2001, its amendment (Law No. 37 (I)/2003) and the Processing of Personal Data (Protection of Individual) (Amending) Law of 2012 (Law No. 105(I)/ 2012) and the Regulation of Electronic Communications.

Any personal information provided by the client to the Company will be treated as confidential and shared only within the Company and its affiliates (if necessary) and will not be disclosed to any third party except under any regulatory or legal proceedings. In case such disclosure is required to be made by law or any regulatory authority, it will be made on a 'need-to-know' basis, unless otherwise instructed by the regulatory authority. Under such circumstances, the Company shall expressly inform the third party regarding the confidential nature of the information.

### **Affiliates and Partners**

The Company may share information with affiliates in the event such information is reasonably required by such affiliate in order to provide the products or services to its clients. The Company may share information with partners, affiliates and associates in order to offer additional similar products and services that meet clients' needs and which are delivered in a manner that is useful and relevant only where clients have authorized the Company to do so.



### **Non-affiliated third parties**

The Company does not sell, license, lease or otherwise disclose clients' personal information to third parties, except as described in this Privacy Policy.

The Company reserves the right to disclose personal information to third parties where required by Law, regulatory and other government authority. The Company may also disclose information as necessary to credit reporting or collection agencies as reasonably required in order to provide the services to Company and/or its clients.

In addition, the Company may engage third parties to help carry out certain internal functions such as account processing, fulfilment, client service, client satisfaction surveys or other data collection activities relevant to its business. Use of the shared information is strictly limited to the performance of the above and is not permitted for any other purpose. All third parties with which the Company shares personal information are required to protect such personal information in accordance with all relevant legislation and in a manner similar to the way the Company protects the same. The Company will not share personal information with third parties which it considers will not provide its clients the required level of protection.

In cases where clients have been introduced by a Business Introducer, such Business Introducer may have access to clients' information. Hence, clients hereby consent to the sharing of information with such Business Introducer.

### **Contact Clients**

From time to time the Company may contact clients whether by phone or email for the purpose of offering them further information about the Company and financial market trading. In addition, the Company may, on occasion, seek to contact clients, whether by phone or by email, for the purpose of informing them of unique promotional offerings provided by the Company for the client. Clients consent to the receipt of such contact when they consent to our terms and conditions of use when registering with the Company. Any person wishing to opt out of further contact with the Company at any time whatsoever is entitled to do so, simply by contacting the Company whether by phone or email and requesting that no further contact on behalf of the Company be made.

### **Restriction of responsibility**

The Company is not responsible for the privacy policies or the content of sites to which ([www.hwfx.com](http://www.hwfx.com) ] links and has no control of the use or protection of information provided by the clients or collected by those sites. Whenever a client elects to link to a co-branded web site or to a linked web site, the client may be asked to provide registration or other personal information. Please note that such information is recorded by a third party and will be governed by the privacy policy of that third party.

### **Use of "COOKIES"**

A cookie is a small text file that is stored on a user's computer for record-keeping purposes. HWFX uses cookies on its website(s). HWFX uses both session ID cookies and persistent cookies. A session ID cookie does not expire when you close your browser. A persistent cookie remains on your hard drive for an extended period of time. You can remove persistent cookies by following directions provided in your Internet browser's 'Help' file. HWFX sets a persistent cookie for statistical purposes. Persistent cookies also enable HWFX to track and target the location and the interests of users that access the HWFX'



website(s) and to enhance the experience of services offered. If you reject cookies, you may still use the 10TradeFX website(s), but you will not be able to use HWFX Direct to submit your application form.

The Company uses cookies to secure clients' trading activities and to enhance the performance of the [www.hwfx.com](http://www.hwfx.com) web site. Cookies used by the Company do not contain personal information or other sensitive information. Please visit our [Cookies Policy](#) for further information.

The Company may share web site usage statistics with reputable advertising companies and with its affiliated marketing companies. It is noted that the information collected by such advertising companies is not personally identifiable. To administer and improve the [www.hwfx.com](http://www.hwfx.com) web site, the Company may use third parties to track and analyse usage and statistical volume information. The third party may use cookies to track behaviour and may set cookies on behalf of the Company. These cookies do not contain any personally identifiable information.

Some of the HWFX business partners use cookies on the Firm's site(s); HWFX has no access or control over these cookies.

### **Privacy Policy Updates**

The Company may update this Privacy Policy from time to time. In the event that the Company materially changes this Policy including how it collects, processes or uses clients' personal information, the revised Privacy Policy will be uploaded in the Company's website. In this respect, the clients hereby agree to accept posting of a revised Privacy Policy electronically on the website as the actual notice of the Company to its clients. Any dispute over the Company's Privacy Policy is subject to this notice and the Client Agreement. The Company encourages its clients to periodically review this Privacy Policy so that they are always aware of what information the Company collects, how it uses it and to whom it may disclose it, in accordance with the provisions of this Policy.

### **Data Protection Officer**

**Our Data Protection Officer's contact details are:**

**Email address:** [dpo@hwfx.com](mailto:dpo@hwfx.com)

**Address:** Tempon 30, Engomi, 2408 Nicosia, Cyprus.