



## Privacy Policy



## Introduction

360 Degree Markets Ltd ("AltumFx", "we", "us", "our", "company") respects your privacy and is committed to taking reasonable steps towards protecting your privacy online and managing your information responsibly, in order to best understand the products and services that are most useful to you.

AltumFx is the brand name of 360 Degrees Markets Ltd which provides financial instrument trading services. We want to notify you of our online privacy practices, the type and categories of information that may be collected, disclosed and stored, how the information is used, with whom the information may be shared, what choices are available to you regarding the collection, use and distribution of the information, what kind of security procedures are in place to protect the loss, misuse or alteration of information under our control, your rights regarding your personal information and who to contact with questions or concerns. This Privacy Policy applies to the AltumFx website located at [www.AltumFx.com](http://www.AltumFx.com) (collectively, the "Website"), to any phone, software, and/or mail operations concerning processing of our services and questions about products or services, as well as our marketing contacts with you.

360 Degrees Markets Ltd is considered a data controller under the definition found in the European Union General Data Protection Regulation 2016-679 ("GDPR").

**By using the Website and/or by contacting us and providing any personal information, you consent to the collection and use of information by us in accordance with this Privacy Policy, as well as the Website Terms and Conditions. If we decide to change our Privacy Policy, we will post those changes on this page and, at the end of this Privacy Policy, indicate the date that changes were last made. The Site and the Services are not intended for minors below the age of 18 years and we do not knowingly collect data relating to minors.**

### **What types of personal information do we collect?**

In the course of providing financial services, we need to collect and maintain certain personal information.

When you use AltumFx Services, we collect information sent to us via your computer, mobile phone or other access device. This information may include your IP address, your hardware information, including device name and type, operating system, location, mobile network information, and web connection information, such as the type of browser, and the pages you accessed on our website.

When you apply for, open, or maintain an account with us, or when you agree to allow us to provide personalized advisory services, we may collect the following information:

- Full Name
- Email Address
- Phone number (Optional)

In accordance with applicable Anti-Money Laundering and Counter-Terrorism Financing regulations and laws, we have an obligation to collect information and verify the identity of our clients. We may also require an identification copy of the client/user for verification purposes.

This information is used to aid and improve your use of the website, for communication purposes, and to comply with any requirements of the law. We shall also use this information to respond to any questions you might have. Without your consent, your email address will not be sold or revealed to third parties, other than as specified in this Privacy Policy, unless we are legally obliged to do so (for example, if requested to do so by Court Order or for the purposes of prevention of fraud or any other crime).

### **Why Do We Collect Personal Information?**

We use and disclose personal information for the purposes that we have disclosed to you, except as otherwise permitted by law. We will request your consent before we use or disclose your information for any materially different purpose. Unless specifically described below, consent may be obtained in any legally sufficient method. For example, depending on the circumstance and the laws of your jurisdiction, consent may be obtained by providing you with notice and the opportunity to opt-out.

In general, we collect, use and disclose personal information to meet the needs of our Clients and for our business purposes, including:

- to provide the products and services you request;
- the day-to-day operation and maintenance of accounts and services;
- to tell you about services or other related products and services offered by us;
- to manage our websites and services;
- to understand our Clients and their needs;
- to learn about Crypto and Forex markets and design and improve our services and related products;
- to administer and process any request for information or job application;
- to comply with our regulatory and legal obligations, including but not limited to warrants, subpoenas and court orders or to meet government tax reporting requirements;
- to contact you (including by way of e-mail), including:

- in response to your inquiries and comments, and to safeguard your interests;
- to investigate suspicious activities; and
- to protect our rights and property.

In the event we propose to buy or sell any business or assets, we may disclose your information in an anonymized form. This information would only be disclosed to a prospective buyer or seller and would also be anonymized. In the event of an acquisition or merger we will give you notice if, and before, there is any transfer of information.

### **Individual Rights for European Economic Area Residents under GDPR (General Data Protection Regulation)**

The GDPR regulation provides rights for individuals (data subjects):

- Right of Access
- Right to Rectification of Erasure Procedure
- Right to Object
- Right to Data Portability

If you are EU resident and wish to exercise any of those rights, please contact us on [support@altumfx.com](mailto:support@altumfx.com)

### **How do we protect the confidentiality and security of personal information?**

We maintain reasonable physical, electronic, and procedural safeguards to protect your personal information. We place your account information on the secure portion of our website, using firewalls and other security technology to protect our network and systems from external attacks, and we require you to enter a unique user name and password to access your account information online. Our servers are enabled with Secure Sockets Layer (SSL) technology to prevent unauthorized parties from viewing the personal information that you provide or access during a secure session (look for the padlock icon on your browser). In addition, if you access information online, we use digital certificate services to authenticate that you are transacting with our website and not the website of an impostor.

If EU data is transferred outside the European Economic Area, we will ensure that the receiving party is in full compliance with General Data Protection Regulation (GDPR) rules through contractual clauses.

Our employees and third party service providers have access to your personal information only on a "need to know" basis. We conduct regular internal audits of our business practices and procedures in order to protect your personal information.

### **How can Clients access and update their personal information or correct any inaccuracy?**

As a Client, you can access and update certain personal information that we collect about you. You may log on to our website using your user name and password. From the home page, click on you user name in the upper right and select the Account tab.

We shall make every reasonable effort to maintain your personal information in an accurate, complete and up-to-date form. If you believe that your personal information is inaccurate, incomplete or out-of-date, you may request a correction at any time. Unless we have your personal information in our capacity as a third-party administrative record keeper, when you successfully demonstrate that your personal information is inaccurate or incomplete, we will correct or update the information as required.

Please note that before we are able to provide you with any information or correct any inaccuracies we may ask you for additional information to verify your identity. We will only use this information to verify your identity.

If you wish to have your data deleted please feel free to send a deletion request to our Chief Privacy Officer at on support@altumfx.com and we will respond to your request within 28 days.

## **Disclosure**

We reserve the right to disclose your personal information to third parties where required by law to regulatory, law enforcement, or other government authorities. We may also disclose your information as necessary to credit reporting or collection agencies, or when necessary to protect our rights or property. To help us improve our services to you, we may engage another business to help us to carry out certain internal functions such as account processing, fulfillment, client service, client satisfaction surveys or other data collection activities relevant to our business. We may also provide a party with client information from our database to help us to analyze and identify client needs and notify clients of product and service offerings. Use of the information shared is strictly limited to the performance of the task we request and for no other purpose. All third parties with which we share personal information are required to protect personal information in a manner similar to the way we protect personal information.

## **Children's Privacy**

Our website is not targeted to children under the age of 18 and we do not intentionally collect personal information from children under the age of 18. If we discover that a child under the age of 18 has provided us with personal information through this website, we will take reasonable steps to delete the information. If you believe we may have accidentally received personal information from a child under the age of 18, please contact us immediately.

## **Cookies**

"Cookies" are small amounts of data that a website can send to your web browser and store on your computer. Our cookies do not contain personal information about you. AltumFx will not store identifying personal information in website cookies.

You do have control over cookies. Most Web browsers can be set to notify you when an HTML cookie is placed on your computer. You can manually delete HTML cookies and set most browsers to refuse to accept HTML cookies, although doing so may affect your website experience.

### **Third Party Links**

In many cases, AltumFx may provide an external link to an outside exchange or other website. This link does not constitute an endorsement. As of this writing, we do not serve ads to our users, we do not promote third party websites or apps, nor do we intend to. We do our best to remain an agnostic, data-centric platform that is free of bias.

### **Security**

The security of your personal information and our Clients' information is important to us.

We follow generally accepted standards to protect the personal information submitted to us, both during transmission and once we receive it. No method of transmission over the Internet, or method of electronic storage, is 100% secure.

### **Amendments**

AltumFx may amend this policy from time to time. The revisions will take effect on the date of publication of the amended policy, as stated. We will notify you through our website of any material changes to the policy. In the event that the changes we make to the policy are substantial or affect the personal information we have already collected in accordance with this policy, you will be entitled to withdraw your consent to such personal information handling practices provided such consent is not necessary for us to provide to you the services or products you have requested.

### **Contact AltumFx**

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to [support@altumfx.com](mailto:support@altumfx.com) or sent in writing to:

**AltumFx**

*Data Controller/Processor*

*Attn: Data Privacy Team*