# **IFC Markets Ltd.**

# Personal Data Protection and Privacy Policy

IFC MARKETS LTD – Personal Data Protection and Privacy Policy (revised October 2021)

IFC Markets Limited has drafted this document, which details how we gather and disseminate information, in an effort to demonstrate our strong commitment to online privacy. We are committed to using our best endeavours to ensure that all information provided is confidential at all times. Please contact us if you have any questions about our privacy policy.

You may submit personal information via forms provided or via email. However please be reminded that notwithstanding all reasonable security measures taken, there are risks in sending confidential information through the Internet forms, emails or other electronic means. It is the sole responsibility of the sender to assume all risk, should they decide to transmit personal or confidential information over the Internet.

All personal or confidential information received by IFC Markets Limited are regarded as confidential and will not be disclosed except:

- with your consent;
- required by law, legal order and legislation;
- regulatory bodies approved by the Labuan Financial Services Authority.

We regard that by providing IFC Markets Limited with your personal information, i.e. name, email, address, telephone numbers, fax number, etc. You agree that our authorised personal can contact you through the means stated.

### Personal Data Protection and Privacy Notice

The protection of personal data is an important concern to IFC Markets Limited ("the Company") and we are committed in ensuring your privacy is protected. This Notice has been prepared in compliance with the Personal Data Protection Act 2010 (Laws of Malaysia, Act 709) ("PDPA"). For the purpose of this Notice, the terms "personal data" and "processing" shall carry the same meaning as prescribed under the PDPA. This Notice applies to investors whose personal data are collected and processed by us.

#### **Provision of Personal Data**

For the purposes of providing you our products and services, the Company has requested for your personal data. We may request additional personal data from time to time to enable us to effectively provide you our products and services and to manage our business relationship with you.

The failure to provide us your personal data, especially personal data, which is obligatory, will result in us being unable to provide you with the requested products and services. The revocation of your consent to the Company to process your personal data may result in us being unable to provide you with effective and continuous products and services.

# **Types of Personal Data**

The personal data obtained and processed by us may include the following information:

- your name, date of birth, identification numbers, marital status, nationality, address, contact numbers, email address, occupation and employer's details, income information, net worth including assets and liabilities and bank account number;
- personal data in relation to your family members; and
- such other relevant information which we may require in order to effectively provide you with our products and services.

# Purposes

We request, gather and process your personal data to understand your investment needs and provide you our products and services, in particular for the following purposes:

- the delivery of our products and services and the marketing of such products and/or services, whether present or future, to you, which may include subscribing, redeeming, switching, or transferring units in investments;
- for client profiling and conducting of marketing activities in connection with our services and related products;
- meeting any legal or regulatory requirements relating to our provision of services and products and to make disclosure under the requirements of any applicable law, regulation, direction, court order, by-law, guideline, circular, code applicable to us, including the requirements of anti-money laundering checks;
- for the organization of seminars, talks or events hosted by IFC Markets Limited or our partners;
- for those purposes specifically provided for in any particular service or product offered by us;
- providing ancillary administrative and management services in connection with your investment, including attending to your enquiries and generally to enable resolution of a concern or complaint; and
- for our internal record keeping.

# **Collection of Personal Data**

We have obtained and may request further personal data from you and other sources which may include but not limited to:

- information from authorised third parties, such as your representatives, financial advisers, legal advisers and financial institutions;
- information obtained from regulatory bodies and governmental agencies; and
- information available in the public domain.

# Security of Your Personal Data

We shall keep and process your personal data in a secure manner. We endeavor to implement the appropriate administrative and security safeguards and procedures to prevent the unauthorized or unlawful processing of your personal data and the accidental loss or destruction of or the unauthorised access, of your personal data. These include:

- physical and logical security control policies maintained to safeguard the confidentiality of your personal data;
- all access to personal records is restricted to authorised personnel only and strictly limited to a need-to-know basis; and
- only authorised third party service providers and vendors are allowed to access and operate the systems.

# **Disclosure of Your Personal Data**

As a part of providing you with our products and services, we may, if deem necessary, disclose your personal data to the following persons:

- our directors, officers and dealer's representatives for purposes relating to your application and use of our products and services;
- the custodians and trustees of the funds and investment portfolios under our management, including custodian banks and trustees' delegates;
- our related, associated or affiliated companies;
- persons authorised by you;
- regulatory bodies such as Bank Negara Malaysia, Securities Commission Malaysia, Labuan Financial Services Authority, Bursa Malaysia Securities Berhad and other regulatory bodies governing our products and our activities;
- any third-party service provider, agent or vendor who has been appointed by us to provide services to us, subject to sufficient security controls over the information;
- our auditors, consultants, accountants, legal advisors or other advisors; and
- any other person to whom such disclosure is required by law or regulatory requirement or pursuant to a court order, notwithstanding that any such persons may be outside Malaysia, for any of the above purposes or any other purpose for which your personal data was to be disclosed at the time of its collection.

### **Your Rights**

You may request access to and details of or a copy of your personal data which we hold about you. A small fee may be payable.

If you believe that any personal data we are holding on you are incorrect or incomplete, you may request for correction of the same.

If you do not wish to receive marketing or promotional materials or advertisements from us, you have the right to request that we stop contacting you or send you these marketing communications.

Your request can be made by writing to us or emailing to the contact personnel below.

## Consent

By providing to us your personal data, you hereby confirm and consent to its use by the Company in accordance with this Notice.

You will be notified of any material amendments to this Notice. Such notification may be mailed to you, included in our periodic statement to you, notified to you via emails and/or accessible from our website at <u>www.ifcmfx.com</u>. If you continue to use our services/products, you shall be deemed to have agreed to accept such changes.

## **Enquiries and Contact Details**

Any queries, concerns or complaints in relation to this Notice or relating to any matter concerning your personal data can be made to the following personnel:

Attention of: Customer support officer Mailing address: Unit Level 14(B) &14(C)Main office Tower Financial park Labuan complex 87000 LABUAN Tel: +60 (87) 599 268 Fax: +60 (87) 599 201 E-mail: support@ifcmfx.com