

# **4 SQUARE SY LIMITED**

## **PRIVACY POLICY**

## **1. INTRODUCTION**

- 1.1. 4 SQUARE SY LIMITED owns and operates the brand “FXRoad” ([www.fxroad.com](http://www.fxroad.com)). 4 SQUARE SY LIMITED (the “Company”) is registered in Seychelles with registration number 8426168-1 and authorised and regulated by the Seychelles Financial Services Authority (the “FSA”) with license number SD052 to carry out investment services under the Seychelles Securities Act 2017 and relevant regulations and guidelines. The Company’s registered office is located at CT House, Office 9A, Providence, Mahe, Seychelles.
- 1.2. This Privacy Policy (the “**Policy**”) applies to the Company and outlines how the Company collects, maintains, uses and discloses personal information about you (the “**User**” or “**Customer**” or “**Client**”). This Policy applies to existing and potential users as well as to any visitors of the Company’s website(s).

## **2. PERSONAL DATA**

- 2.1. In order to open an account with us, you must first complete and submit an application/registration form to us by completing the required information. By completing this application form, you are requested to disclose personal information in order to enable the Company to assess your application and comply with the relevant rules and regulations. The information you provide may also be used by the Company to inform you regarding its services. The Company shall not disclose to a third party any personal information unless required by law and/or competent authority.
- 2.2. The Company may from time to time engage third party providers such as marketing providers, card processing, payment service providers and/or credit institutions, affiliates and/or others to facilitate the business operations and provision of services to the clients whereas some or all clients’ data may be disclosed. Such companies do not retain, store or share information and the information shall be used only for the specific purpose. Such third parties may store your information in order to comply with their legal and other obligations.
- 2.3. Website systems are likely to collect information on your browsing history and IP address, however, such data does not identify you as a user. To this effect, the information is used in order to enhance the provision of services subject to the policies of the Company. Similarly, the Company may use cookies on its website such as ID and persistent cookies which do not expire and remain on your hard drive for statistical purposes to enable tracking and targeting the location and interest of clients. The Company does not have any control over cookies and/or data controlled by third parties.
- 2.4. Tracking systems used on the Company’s website(s) may collect your personal data

in order to optimize the services provided to clients/potential clients. The website collects information in the following ways:

- **Device information**

By recognizing your device used to access and use the Company's website(s), we can provide you with the most appropriate version of our website(s).

- **Log information**

Logging certain behaviors on the site enables the company to track user action and therefore troubleshoot any issues that may occur.

- **Location information**

Using your IP address helps us localize our website content, which we provide to you based on your country, and improve your user experience on our site(s).

- **Cookies**

Cookies are text files with a small amount of data sent from our website(s) to your browser and stored on your computer's hard drive. Cookies help us improve the performance of our website(s) and our website visitors' experience, track your referrer (if any) and improve our future advertising campaigns.

- **Local storage**

You must submit validation documents to us through the Company's Members Area in order to activate your trading account.

### **3. CONSENT**

3.1. 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 your consent at any time by opting out of such information and/or contacting the Company for the same.

3.2. Where our use of your personal information requires your consent, such consent will be provided in accordance with the express written terms which govern our business relationship (which are available on our website(s) as amended from time to time), or any other contract we may have entered into with you or as set out in our communication with you from time to time.

### **4. STORAGE**

4.1. Safeguarding the privacy of your information is of utmost importance to us, whether you interact with us personally, by phone, by mail, over the internet or any other electronic medium. We will hold personal information, for as long as we have a business relationship with you, in a combination of secure computer storage facilities and paper-based files and other records and we take the necessary measures to protect the personal information we hold from misuse, loss,

unauthorized access, modification or disclosure.

- 4.2. When we consider that personal information is no longer necessary for the purpose for which it was collected, we will remove any details that will identify you or we will securely destroy the records. However, we may need to maintain records for a significant period of time. For example, we are subject to certain anti-money laundering laws which require us to retain the following, for a period of five to seven years after our business relationship with you has ended:

## **5. RECTIFICATION**

- 5.1. It is important to us that your personal information is up to date. We will take all reasonable steps to make sure that your personal information remains accurate, complete and up to date. If the personal information we hold about you is inaccurate or incomplete, you are entitled to have it rectified. You may inform us at any time that your personal details have changed by sending us an e-mail at [support@fxroad.com](mailto:support@fxroad.com). The Company will change your personal information in accordance with your instructions. To proceed with such requests, in some cases we may need supporting documents from you as proof, i.e. personal information that we are required to keep for regulatory or legal purposes.

## **6. ERASURE**

- 6.1. You have the right to request for the erasure of your data however such request will be subject to any retention limits we are required to comply with in accordance with applicable laws and regulations.

## **7. OPT-OUT**

- 7.1. Should you not want us to use your personal information, you must inform the Company by sending an email to [support@fxroad.com](mailto:support@fxroad.com). If you decide to do so, we may not be able to continue to provide information, services and/or products requested by you and we will have no liability to you in this respect.

## **8. LEGAL DISCLAIMER**

- 8.1. The Company may disclose your personally identifiable information as required by rules and regulations and when the Company believes that disclosure is necessary to protect our rights and/or to comply with any proceedings, court order, legal process served or pursuant to governmental, intergovernmental or other regulatory bodies. The Company shall not be liable for misuse or loss of personal information or otherwise on the Company's website(s) that the Company does not have access to or control over. The Company will not be liable for unlawful or unauthorized use of your personal information due to misuse or misplacement of your passwords, negligent or malicious intervention and/or otherwise by you or due to your acts or

omissions or a person authorized by you (whether that authorization is permitted by the terms of our legal relationship with you or not).

## **9. REVIEW OF THE POLICY**

- 9.1. The company reserves the right to amend the Policy from time to time and/or insofar as required by legislative amendments and/or requirements. Clients should review the Policy on the website of the company regularly.
- 9.2. If you have a concern about any aspect of our privacy practices, please contact us via email at [support@fxroad.com](mailto:support@fxroad.com).