

Privacy Policy

1. General Provisions

We, IMPEX Trading Limited, is the International Company registered under Republic of Vanuatu International Companies Act, [CAP 222], company number 14860, having its registered address at: PO BOX 1276, Govant Building, Kumul Highway, Port Vila, Republic of Vanuatu, with Dealers in Securities Principle License granted by Vanuatu Financial Services Commission.

Impex Trading Limited is a global Dealer in Securities that provides financial trading services. We offer to our customers a wide range of services and opportunities to get access to stock and OTC markets, providing individual approach. We are aimed to expand our capacities in this area and provide extremely open and beneficial interaction between traders and investors.

We provide this Privacy Policy to let you know all our procedures regarding the collection, use, disclosure storage, refinement, updating, modification, extraction, transfer, distribution, provision, access, blocking, deletion and destruction of information through the website <https://trading-impex.com>, including all of its landing pages (hereinafter referred to as the "Website" and/or "Service"). For us, security and privacy of your personal data are always in the first place. Every day we work hard to keep your personal data safe. We use it strictly in compliance with this Privacy Policy and applicable international legislation. We want to develop our Service with your help and provide you with quality services, so we can update and revise this Privacy Policy from time to time.

By using our Website, you consent to the collection, use and storage of your personal data and other information in accordance with our Privacy Policy as set out below.

Privacy Policy will be reviewed from time to time to take account of new laws and technology, changes to our operations and practices and to make sure it remains appropriate to the changing environment. Any information we hold will be governed by the most current Privacy Policy. The revised Privacy Policy will be uploaded at our Website. In this respect, the users hereby agree to accept posting of a revised Privacy Policy electronically on the Website as the actual notice of Impex Trading Limited to its users. If any of the changes made are of material importance, then we will notify you by email or by means of a notice on the home page. Any dispute over our Privacy Policy is subject to this notice and the Client Agreement. Impex Trading Limited encourages its clients to periodically review this Privacy Policy so that they are always aware of what information collects, how it uses it and to whom it may disclose it, in accordance with the provisions of this Privacy Policy.

Applicable data privacy laws mean all laws and other regulations issued by the supervisory authorities of the respective jurisdictions, including, but not limited to, data protection laws and regulations implementing Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (hereinafter referred to as the “General Data Protection Regulation” and/or “GDPR”).

Relevant national laws take precedence in the event of a conflict between them and this Policy or where these laws impose more stringent requirements. This Policy will also be followed in the absence of relevant national legislation. This Policy applies to the entire process of processing personal data relating to an identified or identifiable individual and does not apply to anonymous or encrypted personal data.

2. Definitions

The definitions below will help you better understand the Privacy Policy:

«Personal Data» or «Personal Information» means any information that is identifiable with you, as an individual. This information may include, but is not limited to, your mailing address, telephone number, email address, Internet Protocol (“IP”) address, age, gender, marital status, health information, financial status, credit card information and credit history. Personal Data, however, does not include your business title, business address or business telephone number in your capacity as an employee of an organization.

«Processing» of Personal Information means any operation or set of operations which is performed upon Personal Information, whether or not by automated means, such as collection, recording, organization, storage, adaptation or alteration, retrieval, use, disclosure or dissemination, and erasure or destruction.

«Controller» means a person or organization which, alone or jointly with others, determines the purposes and means of the processing of Personal Information.

«You», «User», or «Client» means a natural person, who are 18 years of age or older, that registered with the Website as the User and accepted the Policy, Terms of Use, Client Agreement and other documents on our Website.

«Impex», «Company», «We» or «Us» means IMPEX TRADING LIMITED, company, registered under Republic of Vanuatu International Companies Act, [CAP 222], company number 14860, having its registered address at: PO BOX 1276, Govant Building, Kumul Highway, Port Vila, Republic of Vanuatu, with Dealers in Securities Principle License granted by Vanuatu Financial Services Commission.

«Personal data information system» is a set of Personal Data contained in databases and ensuring their processing, information technology and technical resources.

«International transfer of personal data» is the transfer of personal data to the territory of a

foreign state to a foreign government authority, a foreign individual or a foreign legal entity as well.

3. Information Which We Controlled and Collected

Our Company acts both as the Controller and the Processor of your Personal Data.

The Company collects information that you enter when using the official Website of the Company, as well as the information that you provide to the Company by generating a request to open personal account with the Company. By opening personal account with Impex you give the consent to collection, processing, storage and use of Personal Information by Impex as explained below.

The type of Personal Information we may collect can include (but is not limited to):

(i) Personal Information:

- client's full name;
- telephone number;
- residential address (city);
- citizenship;
- email address;
- skype;
- gender;
- date of birth;
- country of birth;
- copies of identity documents (such as your passport or another document with your photo, proving your identity), as well as documents confirming your current residence address and other documents that may be required for verification according to the Company's procedures in one way or another.

(ii) Related information:

Some of the Personal Data that we acquire cannot identify. We may also collect information such as demographic data, information about your use of the Service and general data related to the Website (Non-identifying information). We may collect information received from registered and unregistered users of the Website.

Data from mobile devices (for example location). We can use such information, received from other services. You can hide it from us. If you don't know how to disable your device's location

services, we recommend you contact your mobile service carrier or your device manufacturer

Third parties may also provide us with information about you. If we combine this information with information about you, collected through the Service, we will continue to consider this combined information as indicated in this Privacy policy.

When you visit the Website, the Company may collect information about your IP address, URL, browser, types of plug-ins, operating system, and platform, as well as other data for entering the information and trading system of the Company. The Company works closely with third parties (for example, technical service providers, ad networks, tracking and analytics service providers (including Google), data aggregators, lead generation agencies, public sources, third-party social media sites, and search providers) and may receive from them information about you. Such information may include statistics of visits through the Company's Website, the products you viewed and the history of interaction with the page, your personal contact information (for example, if you were directed to the Company by the Company's Web partner), any Personal Data that is part of your profile on the Website of a third-party social network and/or your data available in the official groups of the Company. It helps the Company to make the process of using the Website more convenient for you and to provide better Services.

The Company or its third-party service providers may use cookies to collect information about you.

We avoid collecting unnecessary Personal Data and try to gather only important information for us with the purpose of data processing and retention.

By submitting your Personal Data you consent to their further processing by Impex Trading Limited and agree to receive any informative messages and other service notifications.

In case of violation of the rules of this Privacy Policy, the user's access to the Service may be blocked for the duration of the internal investigation of the violation.

4. Principles of Processing Personal Data

Pursuant to the general principles Personal Data shall always be:

- processed lawfully, fairly and in a transparent manner in relation to the data subject (principle of lawfulness, fairness and transparency);
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes (principle of purpose limitation);
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (principle of data minimization);
- accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that Personal Data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay (principle of accuracy);

- kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the Personal Data is processed (principle of storage limitation);
- processed in a manner that ensures appropriate security of the Personal Data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures (principle of integrity and confidentiality).

The Company does not disclose to third parties and does not distribute Personal Data without the consent of the User (except for cases when, in accordance with current international legislation, these actions are allowed without the consent of the subject of personal data);

Your Personal Data, provided at the registration and during the usage of our services at the Website, is being transferred to and stored at the server, located in Germany.

The Company determines specific legitimate purposes before the start of processing (including collection / receipt) of Personal Data. The processing of Personal Data in the Company is limited to the achievement of specific, predetermined and legitimate goals.

5. User Requirements

If you have an intention to use Website you should meet the requirements:

- You should be at least 18 (eighteen) full years of age (for natural person); and
- You should be of legal age in the jurisdiction from which you access and use the Service. If you are at least 18 years of age but are a minor under the laws of your country of residence, you must review these Privacy Policy and have the legal representative who will be act on your behalf;
- You should provide true Personal Information in the process of registration, including a contact phone number and a valid email address, confirm these data through a verification procedure and provide the Company with a list of documents in accordance with the requirements of the Company;
- You should take proper and necessary measures to safely store your personal passwords and access to the Website by excluding any disclosure to third parties who are not duly authorized through an authorization procedure agreed with the Company as per Company requirements;
- You should not create more than one account in the Website and shall not open additional Accounts using their registration data;
- You should not carry out the registration of third parties in the Website without the consent and knowledge of the Company.

In the event if you do not agree to comply with changes to or new conditions of this Privacy Policy, you should stop using the services and facilities available from the Company.

Impex is in no way responsible for the intentional actions of third parties with the aim of substituting or replacing a user or a company. This user is personally liable for any actions.

6. How Do We Use Personal Data

Our Company processes (uses/stores/transfers/organizes, etc.) information about you in order to fulfill obligations arising from the data privacy laws applicable to the Company, the Company's licensing obligations to regulatory bodies, any agreements concluded between you and the Company, as well as with the purpose of:

- identifying the user and confirmation of the identity;
- providing you with client service and improving its quality;
- providing you with information, services and products;
- ensuring mutual settlements;
- providing you with technical and other support and communication;
- conducting monitoring/inspections in order to maintain an adequate level of security and implement measures to combat money laundering and terrorist financing;
- monitoring of accounts in order to prevent unfair or illegal actions;
- providing you with marketing information about the goods and services offered by the Company and/or its partners;
- in order to provide information to any of the Parties under the Client Agreement;
- maintaining and storing accounting records, as well as generating statistics for your trading/ investment operations;
- compliance with regulatory requirements by the Company;
- internal administration;
- execution of information exchange according to FATCA and CRS standards;
- for the purposes of judicial and other legal protection of the rights and legitimate interests of the Company.

We need to use and disclose Personal Information in certain ways to comply with our legal obligations.

Also we inform you about cases, when the third person can request from us information your Personal Information:

- in response to lawful requests by public authorities, including to meet legitimate national security or law enforcement requirements;
- to protect, establish, or exercise our legal rights or defend against legal claims, including to collect a debt; to comply with a subpoena, court order, legal process, or other legal requirement;
- or when we believe in good faith that such disclosure is necessary to comply with the law, prevent imminent physical harm or financial loss, or investigate, prevent, or take action regarding illegal activities, suspected fraud.

Within the limits established by the currently applicable law, this Policy and/or the Client Agreement, the Company has the right to transfer information to affiliated persons, including legal entities related to the Company corporately, to third-party contractors (service providers, including liquidity providers, developers of software that uses the Company, sites that carry out AML/CTF and KYC checks, auditors, lawyers, accountants engaged by the Company), banks and other financial institutions involved in mutual settlements between the Company and its clients, judicial and other government agencies. The information that the Company collects, processes, and stores may be transferred, controlled, and processed inside or outside the European Economic Area (hereinafter – “EEA”). In particular, the Company’s service providers may be located in Europe, Asia, and/or other regions. Personal Data transferred to a recipient outside the EEA is subject to protection equivalent to that provided by the GDPR.

We will record all purposes for which we process your Personal Data. We may also use your Personal Data collected from the Service to provide and improve the service, process your requests, prevent fraud, provide you with information and advertising that may interest you, comply with the law and in other cases permitted with your consent.

7. Transfer Your Personal Data Outside the European Economic Area

Under the GDPR we may transfer your Personal Information to affiliated persons, including legal entities related to the Company corporately, to third-party contractors, banks and other financial institutions involved in mutual settlements between the Company and its clients, judicial and other government agencies.

The information that the Company collects, processes, and stores may be transferred, controlled, and processed outside the EEA for the Permitted Purposes as described above. This may include countries that do not provide the same level of protection as the laws of your home country (for example, the laws within the EEA or the United States). We will ensure that any such international transfers are made subject to appropriate or safeguards if required by the GDPR or other relevant laws. You may contact us at any time using the contact details below if you would like further information on such safeguards.

With respect to persons covered by GDPR, in case Personal Information is transferred to countries or territories outside of the EEA that are not recognized by the European Commission

as offering an adequate level of data protection, we have put in place appropriate data transfer mechanisms to ensure Personal Information is protected.

8. Update the Personal Data

We may change this Privacy Policy from time to time. This may be necessary, for example, if the law changes, or if we change our business in a way that affects Personal Data protection.

Any changes at this Privacy Policy will be made available on our Website.

We will not be responsible for any losses arising from any inaccurate, inauthentic, deficient or incomplete Personal Information that you provide to us.

9. Your Rights with Respect to Personal Data We Have Collected

You have the following rights, which we will always work to uphold:

- The right to be informed about our collection and use of your Personal Data. This Privacy Policy should inform you about everything you need to know, but you can always contact us.
- The right to access the Personal Data we hold about you. You may request from the Company confirmation of whether the Company is processing your Personal Data, as well as access to personal data and relevant information about this processing.
- The right to have your Personal Data rectified if any of your Personal Data held by us is inaccurate or incomplete.
- The right to be forgotten, i.e. the right to ask us to delete or otherwise dispose of any of your Personal Data that we hold. This right can be exercised, inter alia: (i) when your Personal Data is no longer needed for the purposes for which it was collected or otherwise processed; (ii) when you withdraw the consent on which the processing is based in accordance with Article 6(1)(a) or Article 9(2)(a) of the GDPR and in the absence of another legal basis for the processing; (iii) when you object to the processing pursuant to Article 21(1) of the GDPR and there is no legal basis for the processing, or when you object to the processing pursuant to Article 21(2) of the GDPR; or (iv) when your Personal Data has been processed unlawfully;
- The right to restrict (i.e. prevent) the processing of your Personal Data.
- The right to object to us using your Personal Data for a particular purpose or purposes.
- The right to data portability. This means that you can ask us for a copy of your Personal Data held by us to re-use with another service or business in many cases.

For more information about our use of your Personal Data or exercising your rights as outlined above, please contact us.

10. Where Do We Store and Process Personal Data

We adopted all statutory requirements with regards our obligations as a data controller and/or processor under GDPR to provide you with adequate legal and organizational level of data protection.

We have taken all appropriate precautions to ensure that our users comply with the highest standards and principles for the protection of Personal Data in accordance with GDPR and other relevant international standards, including applicable legislation. You may contact the Company's Data Protection Officer at any time if you have any questions about data protection.

We may transfer and access Personal Data from around the world. This Privacy Policy shall apply even if we transfer Personal Data to other countries.

11. Use of Cookies

Cookies are small pieces of text stored on your computer to help us determine the type of browser and settings you are using, where you have been on the website, when you return to the website, where you came from, and to ensure your information is secure.

Impex may also use independent external service providers to track the traffic and usage on the Website. Cookies are frequently used on many websites on the internet and you can choose if and how a cookie will be accepted by changing your preferences and options in your browser. We therefore recommend you enable cookie acceptance to benefit from all the services on the Website.

You have the right to decide whether to accept or reject cookies by setting or amending your web browser controls to accept or refuse cookies. If you choose to reject cookies, you may still use our Website though your access to some functionality and areas of our Website may be restricted. As the means by which you can refuse cookies through your web browser controls vary from browser-to-browser, you should visit your browser's help menu for more information.

If you continue to use this Website without changing the cookie settings of your web browser then you are consenting to our cookie policy.

To learn more about cookies and how to manage them please read our Cookies Policy.

12. How We Protect the Personal Data

To ensure the security of your Personal Data, the Company has implemented a number of security measures, including ensuring the security of the operating environment, which is available, if necessary, only to employees, agents, and contractors of the Company; encryption of confidential financial information processed to complete transactions through the Website; mandatory user identification to gain access to the account (personal account), password protection, and other measures.

With the help of modern technical and organizational measures implemented by the Company,

your Personal Data is protected from unauthorized access and illegal processing or disclosure, as well as from accidental loss, alteration, or destruction. These measures are constantly adjusted and updated in accordance with the technical developments of the Company and organizational changes. Besides, data protection audits and other checks are carried out regularly. However, no transmission or storage of data can be fully secured, and therefore the Company cannot guarantee security with respect to any information that the Company collects and stores.

The main data protection measures used by Website are:

- Appointment of the person responsible for the processing of personal data.
- Identification of current threats to the security of personal data during their processing and development of measures to protect personal data.
- Developing a policy regarding the processing of personal data.
- The establishment of individual passwords for employees to access the information system in accordance with their responsibilities.
- The use of the procedures of conformity assessment of information security facilities that have passed in the established manner.
- Certified anti-virus software with regularly updated databases.
- Implementation of internal control and audit.
- Compliance with the conditions ensuring the safety of personal data and excluding unauthorized access to them.
- Detection of facts of unauthorized access to personal data and taking measures connected with such access.

Your account information is encrypted by using special password, stored in close database that we do not share with anyone. In turn, we advise you to choose a password carefully and never disclose it to other persons, take care of the safety of your computer and mobile phone.

13. Period for Which Your Personal Data Will Be Stored

We retain the Personal Data processed for as long as is considered necessary for the purpose for which it is processed (including as required by applicable law or regulation). This means that we will keep your Personal Information for any or a combination of time periods described as follows:

- for as long as required by law;
- until we no longer have a valid reason for keeping it;

- until you request us to stop using it;
- or for so long as our client for who you legally represent remains our client.

If you do not want to use of our services, we can immediately delete your Personal Data by sending your request to impextradinglimited2018@gmail.com.

We reserve the right to keep information that is reasonably necessary after closing of your account when it is required to comply with applicable tax/revenue laws, resolve disputes, and enforce our agreements.

We will delete this information as soon as such data become no needed but no later than 3 years after the closure of your account.

14. Linking to Other Websites

Our Website may provide links to other websites for your information. We do not control, and are not responsible for, the content or practices of these other websites. Those websites may be operated by companies not affiliated with us. Linked websites may have their own privacy policies, which we strongly suggest you review if you visit any linked websites.

Our provision of such links does not constitute our endorsement of these other websites, their content, their owners, or their practices.

15. Contact Information

If you would like to contact us with any queries or comments concerning our Privacy Policy, please feel free to contact us via e-mail or phone.

Tel: +44 2036 0848 23

E-mail: impextradinglimited2018@gmail.com