



Privacy & Internal Privacy Controls Policies

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Alpari International Limited (the "Company" or "Alpari") places a high priority on the privacy and integrity of the personal information of our Customers, both present and future and other visitors to the website www.alpari.org (the "Website"). The Company strives to ensure the safety and confidentiality of all information received from the Customer. This Privacy & Internal Privacy Controls Policy (the "Policy") describes how the Company collects, uses and protects the personal information of the Customer. This Policy is an integral part of the Agreement concluded between the Company and the Customer. Should there be no clear definition of a term set out in this Policy, the interpretation of that term shall be governed firstly by the definition given in the Customer Agreement, and secondly by the definition given in the other documents constituting the Agreement.

1. PRIVACY POLICY & POLICY ON INTERNAL PRIVACY CONTROLS

Alpari routinely collects personal, confidential and sensitive non-public information ("Non-Public Information") from its Customers. Alpari is committed to safeguarding this information so that its confidentiality can be maintained and unauthorized access, use or disclosure of this information can be prevented. If the Customer does not want the Company to use the Non-Public Information the Customer should so inform the Company by email as follows – customercare@alpari.org. Should the Customer wish to opt out, the Company may not be able to continue providing information, services and products requested by the Customer and the Company shall have no liability to the Customer in respect of the same.

Alpari will not use or disclose Non-Public Information for any purpose other than for the performance of business activities or if required by law.

This Policy describes how Alpari protects and handles the Non-Public Information it collects on customers who apply for or receive its products and services. The provisions of this policy apply to current, former and prospective customers of Alpari.

2. THE COLLECTION & USE OF NON-PUBLIC INFORMATION ON CUSTOMERS

When a customer applies for or maintains an account with Alpari, Alpari collects Non-Public Information about the customer.

This information is maintained for evaluating the customer's financial needs, processing customer requests and financial transactions, informing customers about products and services that may be of interest to the customer, and providing customer service. The information collected on customers includes:

- A. information provided to Alpari on applications and other forms, such as the customer's name, address, date of birth, social security number, occupation, assets, and income;
- B. information about the customer's transactions with Alpari or its affiliates;
- C. information Alpari receives from consumer reporting agencies, such as the customer's credit history and creditworthiness, and other entities not affiliated with Alpari;
- D. information provided to verify the customer's identity, such as a passport or driver's license;
- E. information provided to process money transfer orders, bank statements, bank card copies, etc.

The Company may use a Customer's Non-Public Information for one or more of the following purposes:

- to confirm the Customer's identity;
- to process trading and non-trading operations;
- carry out the Company's anti-money laundering policy;
- to inform the Customer of Company products or services that may be of interest to the Customer;
- to provide other services that are relevant to the Customer's business relationship with the Company;
- to keep a correct database of the Customer's account data;
- to analyze statistical data to provide Customers with the most suitable products and services.

3. THE PROTECTION OF NON-PUBLIC INFORMATION MAINTAINED BY ALPARI

Alpari takes the issue of security very seriously and takes all possible measures to ensure the safety of your confidential information, including adhering to strict standards for the internal use of confidential information and using leading data storage technology.

3.1 Limited Employee Access

Alpari limits employee access to customers' Non-Public Information on a need to know basis. Only those employees who need to access customer information to conduct the Company's business, such as servicing customer accounts and helping customers accomplish their financial objectives, are granted access to this information.

All employees granted access to a customer's Non-Public Information must protect the confidentiality of this information and follow established procedures for the handling of Non-Public Information.

3.2 Secure Environment

Alpari maintains physical, electronic and procedural safeguards to keep Non-Public Information secure and protected. Non-Public Information is maintained either: (a) in a hardcopy format, which is stored in a file and placed in a locked file cabinet; or (b) electronically, in one of the Company's password protected databases.

Not all employees, consultants or outside vendors shall be granted access to Alpari's customer files and electronic records. Access to Non-Public Information is restricted to designated individuals.

3.3 Policy for Credit/Debit Cards

When making a payment with a credit/debit card, you will be transferred to the site of the processing center where you will fill out a form. To prevent the unauthorized use of your credit/debit card, your card information is transmitted to Alpari in shortened form and through a secure server.

In certain exceptional circumstances, Alpari may refund payments made by credit or debit card. In this case, the funds will be refunded to the card that was used for the deposit.

3.4 The Disclosure of Non-Public Information With Affiliates or Non-Affiliated Third Parties

Alpari may occasionally share Non-Public Information with its affiliates or third-party service providers and joint marketers not affiliated with Alpari. This information may be shared for a variety of purposes, such as to support the financial products and services provided to customers, to service customer accounts, to cooperate with regulatory authorities and law enforcement agencies, to comply with court orders or other official requests, or, as necessary, to protect Alpari's rights or property.

A. Affiliates

Affiliates include:

- a. companies controlled or owned by Alpari;
- b. companies controlling or under common control with Alpari;
- c. financial service companies, such as dealers, other brokers, futures commission merchants, and advisers.

Alpari may be required to share Non-Public Information, such as customer information or Alpari's audited financial statement, with its affiliates to comply with regulatory requirements requiring that due diligence be conducted on customers, to establish an account with the affiliate, or for the purposes of assessing Alpari's creditworthiness and financial stability.

B. Non-Affiliated Third Parties

Non-affiliated third parties include:

- a. regulatory authorities and law enforcement agencies;
- b. companies under contract to perform services for Alpari or on Alpari's behalf, such as: consultants; outside auditors; and vendors that prepare and mail statements and transaction confirmations or provide data processing, computer software maintenance, and development, transaction processing and marketing services;
- c. financial service institutions (e.g., advisers, dealers, brokers, trust companies and banks) with whom Alpari has an introducing/referral relationship, joint marketing agreement (such as an agreement to market financial services or products that Alpari and these institutions jointly offer, endorse or sponsor) or other business relationship;
- d. clearing FCMs through which Alpari clears customer trades, such as an FCM with which Alpari has an introducing relationship or a prime brokerage;
- e. law firms or legal advisors.

Alpari may be required to share Non-Public Information with non-affiliated third parties listed above for the following reasons: as part of an annual audit of Alpari's books and financial records; routine audits of Alpari's trading platforms; to comply with a regulatory request for information (e.g. during an annual review performed by the Mauritius Financial Services Commission); and for the purpose of obtaining legal advice, guidance or representation.

The information Alpari may be required to share with these non-affiliated third parties includes: account opening documents, such as a driver's license, passport or other forms of government-issued identification; personal data, such as legal name, date of birth, address and passport number; financial information pertaining to accounts held by customers at other financial institutions, such as bank account numbers, account statements; and customer trading history.

The Company will oversee that all non-affiliated third parties will adhere to the terms of this Policy and take all necessary steps to protect the Customer's Non-Public Information.

3.5 Use of Information

By accepting the Customer Agreement, the Customer consents to the Company collecting, maintaining, using and disclosing their Non-Public Information in accordance with the terms of this Policy.

3.6 General Disclosure Requirements

Any affiliate or non-affiliated third party acting on Alpari's behalf is required to keep any Non-Public Information obtained through Alpari confidential.

Vendors or other persons or entities with whom Alpari contracts to do business must have their own internal privacy policy, which ensures that the Non-Public Information is kept confidential. In certain circumstances, they may also be required to sign a Mutual Confidentiality and Non-Disclosure Agreement. It is against the Company's policy to sell, rent or otherwise distribute its customers' Non-Public Information to affiliates or non-affiliated third parties.

4. CUSTOMER ACCESS TO NON-PUBLIC INFORMATION & CHANGES TO PRIVACY POLICY

4.1 Customer Access to Non-Public Information

Alpari endeavors to keep its customer files complete and accurate. Alpari shall give its customers reasonable access any Non-Public Information maintained on that customer.

4.2 Changes to Privacy Policy

This Policy is set out on the Website and Alpari may update this Policy from time to time. The revised Policy together with a general notice informing customers of such change will be promptly posted to the Website as and when this Policy is materially amended. The Customer irrevocably agrees the posting of a revised Policy electronically on the Website as constituting actual notice to the Customer. Any dispute over the Policy is subject to this notice. The Customer is encouraged to periodically check back and review this Policy so that the Customer will always know what information the Company collects, how is it used, and to whom it may be disclosed.

5. COMMUNICATION AND USE OF COOKIES

5.1 Communication

Unless otherwise indicated for a particular service, any communication or material of any kind that the Customer e-mails or otherwise transmits through the services, including information, data, questions, comments or suggestions will be treated as non-proprietary and non-confidential. By accepting the Customer Agreement, the Customer grants a license to the Company to use the Customer's communications in any way the Company thinks fit, either on the Website or elsewhere, with no liability or obligation to the Customer and the Company shall be free to use any idea, concept, know-how or technique or information contained in the Customer's communications for any purpose including, but not limited to, developing and marketing products.

5.2 Cookies

Cookies are small files of information, which often include a unique identification number or value, which are stored on your computer's hard drive as a result of you using this trading software and accessing the Website.

The trading software used by the Company enables it to use cookies in relation to the Customer's access to the Website and the purpose of this information is to provide the Customer with a more relevant and effective experience on the Website, including presenting web pages according to the Customer's needs or preferences.

Cookies are frequently used on many websites on the internet and the Customer can choose if and how a cookie will be accepted by changing the preferences and options in the Customer's browser. The Customer may not be able to access some parts of the Website if the Customer chooses to disable the cookie acceptance in the browser, particularly the secure parts of the Website.

ALPARI INTERNATIONAL LIMITED