



Trust. Expertise. Transparency.

IMM GROUP LTD.
Trust Company Complex, Ajeltake
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Tel: +44 20 3695 0059
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Privacy Policy

Protecting the privacy and safeguarding the personal and financial information of our clients and website visitors is one of our highest priorities. The following Privacy Statement explains how IMM GROUP LTD ("IMMFX") collects and protects your personal information. References to "IMMFX" in this Privacy Statement include all IMMFX companies and divisions, including IMMFX.com.

By opening a IMMFX account or by using IMMFX Web sites, you give your consent to the collection and use of personal information by IMMFX as explained in this privacy statement.

Collection of personal information

We collect information required to open an account, to transact business effectively and to safeguard your privacy. To do this, we gather information to help us assess your needs and preferences.

The information we collect directly from you includes information required to communicate with you, including your name, mailing address, telephone number, e-mail address. In addition, we collect information required by law to identify who you are, including Passport number. We also collect demographic information when you open an account, including birth date, occupation and employment status.

You directly provide to us the majority of information we collect. You do this by completing the account application and related documentation, by placing a trade, by sending us an e-mail, or by submitting information in response to a promotion or special offer. Other ways we obtain information are by (1) observing your usage of the Web site, and (2) providing products and services to you. This information enables us to offer you products and services that should be of interest to you.

The information we collect indirectly from you includes your Internet protocol ("IP") address, browser type, operating system, Internet service provider (ISP), time stamps, transactions placed, and banner ads you click. We do this through the use of cookies, which are small text files sent from the Web server and may be stored on your computer. Cookies help us to know you better by providing operational data we can use to aid your interaction with our Web site and improve its navigation and usability.



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Usage of personal information

IMMFX may use the information collected from you to verify your identity and contact information. We may also use this information to establish and set up your trading account, issue an account number and a secure password, maintain your account activity, and contact you with account information. This information helps us improve our services to you, customize your browsing experience and inform you about additional products, services or promotions that may be of interest to you.

Should you close your account with us, IMMFX will retain your information, but only use it to comply with regulatory requirements and to periodically contact you to offer you the opportunity to reactivate your account or participate in other valuable offers.

IMMFX affiliates and partners

IMMFX may share information with affiliates if the information is required to provide the product or service you have requested or to provide you the opportunity to participate in the products or services our affiliates offer. IMMFX also forges partnerships and alliances, which may include joint marketing agreements, with other companies who offer high-quality products and services that might be of value to our clients. In order to ensure that these products and services meet your needs and are delivered in a manner that is useful and relevant, IMMFX may share some personal information with partners, affiliates and alliances. This allows them to better understand the offers that are most relevant and useful. In our strategic relationships, we will require that it be identified that an offer is being extended because of the relationship with us. The use of your personal information is limited to the purposes identified in our relationship with the partner or affiliate.

Non-affiliated third parties

IMMFX does not sell, license, lease or otherwise disclose your personal information to any third party for any reason, except as described below.

IMMFX reserves 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.



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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. Examples of information shared are identifying information such as name, mailing address, e-mail address and, telephone number, and information on account activity.

If at any time you choose to purchase a product or service offered by another company, for example by clicking on an advertisement on a Web site owned or controlled by IMMFX, any personal information you share with that company will no longer be controlled under our Privacy Statement. We are not responsible for the privacy policies or the content of sites we link to and we have no control of the use or protection of information provided by you or collected by those sites. Whenever

you elect to link to a co-branded Web site or to a linked Web site, you may be asked to provide registration or other information. Please note that the information you are providing is going to a third party, and you should familiarize yourself with the privacy policy published by that third party.

Opting out of disclosures of non-public personal information

You may direct us not to disclose non-public personal information to certain third parties. To opt out of sharing non-public personal information with third parties, please contact IMMFX as stated in the contact information listed below. Note that for joint accounts, an opt out election made by one account owner of a Joint account is applicable to all account owners of the Joint account. An opt-out election must be made for each separate account you hold at IMMFX.

If we propose to share information in a manner not covered in this Privacy Statement, we will notify you of this change by posting an addendum on the IMMFX Web site, a notice in the "What's New" section of the Web site, and if appropriate, provide you an opportunity to opt out of such use.



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The security of your personal information

We employ security software, systems, and procedures to offer you a safe and secure trading environment and protect your personal, financial and trading information.

When you open an account with us, you are issued a unique account number, User ID and a password. Only a limited number of IMMFX employees who have a need to know this information will have access to your account number, UserID, and password. Remember: you are ultimately responsible for maintaining the secrecy of your account number, User ID, and password. We strongly recommend that you do not disclose this information to any one else.

IMMFX may share Web site usage information about visitors to the Web site with reputable advertising companies for targeting our Internet banner advertisements on this site and other sites. For this purpose, pixel tags (also called clear gifs or web beacons) may be used to note the pages you've visited. The information collected by the advertising company through the use of these pixel tags is not personally identifiable.

To administer and improve the IMMFX Web site, we may use a third party to track and analyze usage and volume statistical information, including page requests, form requests, and click paths. The third party may use cookies to track behavior and may set cookies on behalf of IMMFX. These cookies do not contain any personally identifiable information.

Changes to this Privacy Statement

In the event IMMFX materially changes this Privacy Statement, the revised Privacy Statement will promptly be posted to the Web sites and we will post a notice on our Web sites informing you of such changes. You agree to accept posting of a revised Privacy Statement electronically on the Web site as actual notice to you. Any dispute over our Privacy Statement is subject to this notice and the IMMFX Customer Agreement. If you have any questions that this statement does not address, please contact a Client Services representative.

You may contact IMMFX for any reason under this **Privacy Policy**.