

PRIVACY POLICY

Introduction

Empire FX Trade Limited, trading as Empire FX, is a Limited Liability Company incorporated in Kenya, incorporation number PVT-27U5EA9J, authorised and regulated by the Capital Markets Authority as a Dealing Foreign Exchange Broker, license number (pending) and whose registered address is Gallant, 6th Floor, Office no. 4, along Parklands Road, Westlands, Nairobi and of P.O Box 2883-00606 Nairobi, Kenya.. References to 'Empire FX' throughout this document relates to 'Empire FX', unless stated otherwise.

This privacy policy explains how Empire FX collects your personal data, how it maintains it and how it discloses the personal data collected.

Protecting the privacy and safeguarding the personal and financial information of Empire FX clients and website visitors is one of our highest priorities. This Privacy Statement sets out the company's policy on protection of our client's privacy. Empire FX will only use your personal data in accordance with this privacy policy.

Collection of Personal Information

We collect information required to open an account, to transact business effectively and to safeguard your assets and 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. We also collect birth date and your location information. All information collected is in accordance with data protection and AML/KYC laws and regulations.

Data to be collected.

Information we collect about you.

While using our website and/or trading platform and/or App, we may derive information from such use and may store this information with your personal profile. This information may include site areas visited, pages viewed, frequency and duration of visits, Internet Protocol (IP) address, your Geographic location, computer identification parameters or version of app used and the date the app was installed, types of transactions conducted, documents downloaded, mouse clicks, mouse movements, scrolling activity as well as text you type in this website and which website referred you to ours or to which websites you link, type and model of computer or telecommunication device used by website visitor, frequency and duration of sessions per page visit, data and documents of website accessed by website visitor, language preference and preference to receive communication from us, Closed Circuit Television (CCTV) surveillance recordings obtained following your visit to our offices. CCTV Devices are installed at strategic locations at our office premises to provide a safe and secure environment in all our premises as a part of our commitment to community safety, security and crime prevention. Telephone Conversations: In each of your discussions with members of our staff we may collect the following opening of your account.

Information you give us:

Empire FX Trade Limited, PO BOX 2883-00606 Nairobi, Kenya

Support: +254 115 777 777

Website: www.empirefx.africa support@empirefx.africa

By entering into a business relationship and in the course of correspondence in physical or electronic form with us, we will collect and store personal information about you, as it is required to provide you with the services you requested and to comply with legal and regulatory obligations. This includes, among others, your date of birth, your address and a photocopy of your national ID card, passport, or other form of ID and a copy of a recent proof of address. Tax Identification Certificates, country of residence, geo location information, information related to your financial status, such as your bank account/s and Credit Card/s details or other means of payments, the origin of funds, annual income, deposits and withdrawals history, information in regards to funds and financial instruments kept by the Company on your behalf, occupation, relevant data and types of transactions conducted, documents downloaded and/or uploaded, phone number and email address. We also collect and processes personal information about you that are necessary for us, in order to provide you with our services. This includes information about you when you complete an online application or another type of form and when you access and trade through your account.

Usage of Personal Information

We use personal information only as appropriate to provide you quality service and security. For example, we 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, inform you about additional products, services or promotions that may be of interest to you among other purposes which include:

- i. verifications of an identity and contact information
- ii. the setup of a trading account, the issuing of a client account number and a secure password,
- iii. to manage your account and to provide the services to you that you have requested including processing transactions.
- iv. to maintain the activity of a client account and client profile
- v. to contact you when necessary or appropriate in relation to the services being provided to you.
- vi. For marketing purposes, including, but not limited to providing you with information regarding the products and services offered by Empire FX or its Partners. In developing an understanding of the products and services that you may be interested in obtaining from Empire FX or its Partners.
- vii. To provide you with information or opportunities that we believe may be relevant to you.
- viii. To tailor the website and our app to your needs and interests by ensuring that content is presented effectively to you.
- ix. To enforce the governing terms and conditions.
- x. To conduct surveys and questionnaires.

Non -Affiliated Third Parties

We do not sell, license, lease or otherwise disclose your personal information to any third party for any reason, except as described below. We reserve 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. 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, fulfilment, 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.

Restriction of Responsibility

If at any time you choose to purchase a product or service offered by another company, 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 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 provided by that third party.

Opting out of disclosure of non-personal information

You may direct us not to disclose non-public personal information to certain non-affiliated third parties. To opt out of sharing non-public personal information with non-affiliated third parties, please contact support@empirefx.africa. 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 with us.

Use of Cookies

A cookie is a small text file stored on the user's computer for record keeping and security purposes. It allows us to enhance user experience while browsing our website. Empire FX issues cookies upon landing on our website, unless the cookie settings on user's browsers are disabled. Please be notified that by turning off cookie tracking in your browser, some of our services might become unusable such as promotions or registration. Cookies used by us do not contain any personal information nor do they contain account or password information. They merely allow the site to recognize that a page request comes from someone who has already logged on. To administer and improve our web site, we may use a third party to track and analyze usage and statistical volume 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 us. These cookies do not contain any personally identifiable information.

Marketing communication

While registering your information with us, you have agreed to receive marketing services, which provides you with information regarding the products and services offered by Empire FX or its partners and opportunities that we believe may be relevant to you, newsletters, emails and SMS (text) messages, and other electronic communication. If you no longer wish to receive the above mentioned types of communication, you may opt-out by following the instructions included in each message or by sending an email to support@empirefx.africa

Retention of your personal data

All personal data that you provide to us is held and stored in a combination of secure cloud storage facilities, held electronically on off-site back – up servers or held within multiple cloud servers. We take all the necessary steps to protect the personal information collected from you against any misuse, compromise, loss, unauthorized access, modification or disclosure.

Your Rights

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us on support@empirefx.africa

You may inform Empire FX at any time that your personal details have changed or that you wish to delete the personal information we hold about you by emailing us at support@empirefx.africa We will change or delete your personal information in accordance with your instructions, except to the extent that we are required to hold your personal information for regulatory or legal purposes, to provide you with the services you have requested or to maintain adequate business records.

Further, you have the right to access your information that we hold about you. To exercise this right, please contact us via support@empirefx.africa verifying your identity and specifying the exact information you require.

Empire FX is doing its utmost to comply with this Privacy Policy. If you have any questions, concerns or complaints regarding this Policy and the enforcement thereof, please refer them to: support@empirefx.africa. After receiving your complaint, Empire FX may contact you to better understand your concerns and will make all efforts to promptly answer your question or resolve your complaint to your full satisfaction.

Changes to this Policy

From time to time, we may update this Privacy Statement. In the event we materially change this Privacy Statement, the revised Privacy Statement will promptly be posted to the websites, and we will post a notice on our websites informing you of such changes. You agree to accept posting of a revised Privacy Statement electronically on the website as actual notice to you. Any dispute over our Privacy Statement is subject to this notice and our Customer Agreement. We encourage you to periodically check back and review this policy so that you always will know what information we collect, how we use it, and to whom we disclose it. If you have any questions that this statement does not address, please contact a Client Services representative at support@empirefx.africa.