



PhoenixLtd

Privacy and Cookies Policy

Last Updated – September 2022





Introduction

Phoenix Limited is a Securities Dealer Licensee regulated and authorised by the Financial Services Authority ('FSA') in Seychelles under the license number SD113 (hereinafter referred to the "Company").

This Privacy and Cookies Policy (the "Policy") explains what you need to know about the products we can offer you. It is designed to provide you with the information you need to determine whether the products we offer are appropriate for your personal objectives, financial situation and needs, by explaining the risks, rights and obligations associated with our products.

Our Commitment to You

Thank you for showing interest in our service. In order for us to provide you with our service, we are required to collect and process certain personal data about you and your activity.

By entrusting us with your personal data, we would like to assure you of our commitment to keep such information private.

We have taken measurable steps to protect the confidentiality, security and integrity of this data. We encourage you to review the following information carefully.

Grounds for data collection

Processing of your personal information (meaning, any data which may potentially allow your identification with reasonable means; hereinafter "Personal Information") is necessary for the performance of our contractual obligations towards you and providing you with our services, to protect our legitimate interests and for compliance with legal and financial regulatory obligations to which we are subject.

When you use our services, you consent to the collection, storage, use, disclosure and other uses of your Personal Information as described in this Policy.

How do we receive information about you?

We receive your Personal Information from various sources:

- When you voluntarily provide us your personal details in order to create a Phoenix account (for example, your name and email address);
- When you use or access our site and services, in connection with your use of our services (for example, your financial transactions);
- From third party providers and services, such as credit reference agencies, fraud prevention agencies, identity verification vendors, banks, authentication service providers and public registers.

What type of information we collect?

In order to open a Phoenix account, and in order to provide you with our services we will need you to collect the following information:



Personal Information

We collect the following Personal Information about you:

- Registration information – your name, email address, phone number, occupation, country of residence, and your age (in order to verify you are over 18 years of age and eligible to participate in our service).

Voluntary information – when you communicate with us (for example when you send us an email or use a “contact us” form on our site) we collect the personal information you provided us with.

- Financial information – by its nature, your use of our services includes financial transactions, thus requiring us to obtain your financial details, which includes, but not limited to your payment details (such as bank account details and financial transactions performed through our services).
- Technical information – we collect certain technical information that is automatically recorded when you use our services, such as your IP address, MAC address, device approximate location

Non-Personal Information

We record and collect data from or about your device (for example your computer or your mobile device) when you access our services and visit our site. This includes, but not limited to: your login credentials, UDID, Google advertising ID, IDFA, cookie identifiers, and may include other identifiers such your operating system version, browser type, language preferences, time zone, referring domains and the duration of your visits. This will facilitate our ability to improve our service and personalize your experience with us.

If we combine Personal Information with non-Personal Information about you, the combined information will be treated as Personal Information for as long as it remains combined.

Tracking Technologies

When you visit or access our services we use (and authorize 3rd parties to use) pixels, cookies, events and other technologies ("Tracking Technologies"). Those allow us to automatically collect information about you, your device and your online behaviour, in order to enhance your navigation in our services, improve our site's performance, perform analytics and customize your experience on it. In addition, we may merge information we have with information collected through said tracking technologies with information we may obtain from other sources and, as a result, such information may become Personal Information.

How do we use the information we collect?

- Provision of service - we will use your Personal Information you provide us for the provision and improvement of our services to you.
- Marketing purposes - we will use your Personal Information (such as your email address or phone number). For example, by subscribing to our newsletter you will receive tips and announcements straight to your email account. We may also send you promotional material concerning our services or our partners' services (which we believe may interest you), including but not limited to, by building an automated profile based on your Personal Information, for marketing purposes. You



may choose not to receive our promotional or marketing emails (all or any part thereof) by clicking on the “unsubscribe” link in the emails that you receive from us. Please note that even if you unsubscribe from our newsletter, we may continue to send you service-related updates and notifications, or reply to your queries and feedback you provide us.

- **Opt-out of receiving marketing materials** - If you do not want us to use or share your personal information for marketing purposes, you may opt-out in accordance with this "Opt-out" section. Please note that even if you opt-out, we may still use and share your personal information with third parties for non-marketing purposes (for example to fulfil your requests, communicate with you and respond to your inquiries, etc.). In such cases, the companies with whom we share your personal information are authorized to use your Personal Information only as necessary to provide these non-marketing services.
- **Analytics, surveys and research** - we are always trying to improve our services and think of new and exciting features for our users. From time to time, we may conduct surveys or test features, and analyse the information we have to develop, evaluate and improve these features.
- **Protecting our interests** - we use your Personal Information when we believe it’s necessary in order to take precautions against liabilities, investigate and defend ourselves against any third party claims or allegations, investigate and protect ourselves from fraud, protect the security or integrity of our services and protect the rights and property of Phoenix Ltd., its users and/or partners.
- **Enforcing of policies** - we use your Personal Information in order to enforce our policies, including but limited to our Terms, or Client Agreement.
- **Compliance with legal and regulatory requirements** - we also use your Personal Information to investigate violations and prevent money laundering and perform due diligence checks, and as required by law, regulation or other governmental authority, or to comply with a subpoena or similar legal process.

With whom do we share your personal information?

- **Internal concerned parties** - we share your information with companies in our group, as well as our employees limited to those employees or partners who need to know the information in order to provide you with our services.
- **Business partners** - we share your information with business partners, such as storage providers and analytics providers who help us provide you with our service.
- **Legal and regulatory entities** - we may disclose any information in case we believe, in good faith, that such disclosure is necessary in order to enforce our Terms or Client Agreement, take precautions against liabilities, investigate and defend ourselves against any third-party claims or allegations, protect the security or integrity of the site and our servers and protect the rights and property of PHOENIX LTD., its users and/or partners. We may also disclose your personal information where requested by our regulator FSA, or any other regulatory authority having control

or jurisdiction over us, you or our associates or in the territories we have clients or providers, as a broker.

- Merger and acquisitions – we may share your information if we enter into a business transaction such as a merger, acquisition, reorganization, bankruptcy, or sale of some or all of our assets. Any party that acquires our assets as part of such a transaction may continue to use your information in accordance with the terms of this Policy.

Cookie Disclosure

Cookies are small text files that are placed on your computer by websites that you visit. They are widely used in order to make websites work, or work more efficiently, as well as to provide information to the owners of the site. NBHM use cookies to personalise content and ads, to provide social media features and to analyse our traffic. NBHM also share information about your use of our site with our social media, advertising and analytics partners who may combine it with other information that you've provided to them or that they've collected from your use of their services.

[The table below explains the cookies we use and why:](#)

Name	Expiry	Purpose description
_ga	2 years	Used by Google Universal Analytics to distinguish unique users by assigning a randomly generated number as a client identifier.
_gat	1 day	Used by Google Universal Analytics to throttle request rate.
_gid	1 day	Used by Google Universal Analytics to store and update a unique value for each page visited.
_pk_id	1 year	Used by Matomo Analytics Platform to help us track visitor behaviour and measure site performance.
_pk_ses	1 day	Used by Matomo Analytics Platform to track page requests from the visitor during the session.
_fbp	3 months	Used by Facebook to deliver a series of advertisement products such as real time bidding from third party advertisers.
freshworks-s360-vid	1 year	Website Live Chat Software by Freshworks
CP-Session-ID	1 day	These cookies keep track of non-personally identifiable information about users of the my.nbhm.eusite, including: browser used to access the site, date and time, the URL of the page being loaded, users who have visited a particular website(s), any previously assigned cookie identification (a unique identifier assigned to a user to identify repeat visitors), browser window size, the geographic location of the user, device and operating system used to access the Site.

Most web browsers allow some control of most cookies through the browser settings. To find out more about cookies, including how to see what cookies have been set, visit allaboutcookies.org

Find out how to manage cookies on popular browsers:

- Google Chrome
- Microsoft Edge
- Mozilla Firefox
- Microsoft Internet Explorer
- Opera
- Apple Safari

To opt out of being tracked by Google Analytics across all websites: [Google Analytics Opt-out Browser Add-on](#)

Visit [Off-Facebook Activity tool page to Manage Your Off-Facebook Activity or Clear History](#). That page can tell you which companies are supplying Facebook with information about your real-world activity.

How we protect your information

We have implemented administrative, technical, and physical safeguards to help prevent unauthorized access, use, or disclosure of your personal information. Your information is stored on secure servers and isn't publicly available. We limit access of your information only to those employees or partners that need to know the information in order to enable the carrying out of the agreement between us.

You need to help us prevent unauthorized access to your account by protecting your password appropriately and limiting access to your account (for example, by signing off after you have finished accessing your account). You will be solely responsible for keeping your password confidential and for all use of your password and your account, including any unauthorized use.

While we seek to protect your information to ensure that it is kept confidential, we cannot absolutely guarantee its security. You should be aware that there is always some risk involved in transmitting information over the internet. While we strive to protect your Personal Information, we cannot ensure or warrant the security and privacy of your personal Information or other content you transmit using the service, and you do so at your own risk.

Retention

We will retain your personal information for as long as necessary to provide our services, and as necessary to comply with our legal obligations, resolve disputes, and enforce our policies. Retention periods will be determined taking into account the type of information that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable time. Under applicable regulations, we will keep records containing client personal data, trading information, account opening documents, communications and anything else as required by applicable laws and regulations.



HOW TO CONTACT US?

If you decide to terminate your account, you may do so by emailing us at info@ltdphoenix.com. If you terminate your account, please be aware that personal information that you have provided us may still be maintained for legal and regulatory reasons (as described above), but it will no longer be accessible via your account.

Updates to this Policy

This Policy is subject to changes from time to time, at our sole discretion. The most current version will always be posted on our website (as reflected in the "*Last Updated*" heading). You are advised to check for updates regularly. In the event of material changes, we will provide you with a notice. By continuing to access or use our services after any revisions become effective, you agree to be bound by the updated Policy.



PhoenixLtd

Phoenix LTD is authorised and regulated by the Financial Services Authority (FSA) of Seychelles with license number: SD113. Phoenix LTD's registration number is 8430083-1.

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