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# Privacy Policy

OXShare

2021

## 1- INTRODUCTION

As part of providing services, or information about our services, to you, we will need to verify your details to set you up as a customer and we will need to use those details in order to effectively manage your account with us to ensure that you are getting the best possible service from us. This may include third parties carrying out credit or identity checks on our behalf. It is not only in our legitimate interest to do so but the use of your personal information in this way is necessary for us to know who you are as we have a legal obligation to comply with certain Know Your Customer regulatory obligations.

### **To provide you with products and services, or information about our products and services, and to review your ongoing needs**

Once you open an account with us, or subscribe to an update or webinar, we will need to use your personal information to perform our services and comply with our obligations to you. It is also in our legitimate interests to ensure that we are providing the best products and services so we may periodically review your needs to ensure that you are getting the benefit of the best possible products and services from us.

## 2- LEGAL FRAMEWORK

The Company is required to comply with the provisions of the applicable laws regarding the prevention of Money Laundering and Terrorist Financing. The main purpose of these Laws is to define and criminalize the laundering of proceeds generated from all serious criminal offences aiming at depriving criminals from the profits of their crimes. In accordance with the AML and CTF Laws, the Company is obliged to set out policies and procedures for preventing money laundering and Terrorist Financing activities. The AML and CFT procedures, which are implemented by the Company, are based on AML and CFT laws applicable in Saint Vincent, the recommendations of The Financial Action Task Force (FATF), in addition to other documents and information.

## 3- purpose

The purpose of "AML, CFT & KYC Policy", ("the Policy"), is to provide guidance on the Anti-Money Laundering ("AML"), Counter Terrorism Financing ("CFT"), and Know your Client ("KYC") procedures. This policy applies to all Company's officers, employees, introducing brokers, affiliated companies, and products and services offered by the Company. Any employee found not to be adhering to these policies and procedures will face severe disciplinary action

#### 4- WHY DOES OXSHARE COLLECT PERSONAL INFORMATION

Our goal is to fully satisfy our clients' requirements whilst meeting our obligations. To do this effectively, we need to collect and retain certain personal information. It is your choice to provide OXSHARE LLC with the information required and requested, however any missing information may result in OXSHARE LLC being unable to provide you with trading services and your account may not be approved, or if opened, may be terminated.

#### 5- WHAT KIND OF PERSONAL INFORMATION DO WE ASK FOR?

The type of data collected and purpose of collection The type of data we collect along with the purpose for collection is listed below:

Personal data type:

- 1- Personal information such as gender, name, date of birth and address
- 2- Contact information (email address and phone number)
- 3- Employment information, financial information, relevant education and trading experience
- 4- Ethnicity, citizenship and social security numbers or national identity and passport numbers
- 5- Proof of photo ID, address verification
- 6- Unique device number (IP address) and device information including version of web browser you use
- 7- Financial sanctions and credit header information

#### 6- How do we respond to legal requests or prevent harm?

We access, preserve and share your information with regulators, law enforcement or others by request:

- 1- We can respond to legal requests when we have a good-faith belief that the response is required by law in that jurisdiction, affects users in that jurisdiction, and is consistent with internationally recognized standards.
- 2- When we have a good-faith belief it is necessary to: detect, prevent and address fraud, unauthorized use of the services or products, violations of our terms or policies, or other harmful or illegal activity; to protect ourselves (including our rights, property or Products), you or others, including as part of investigations or regulatory inquiries; or to prevent death or imminent bodily harm. For example, if relevant, we provide information to and receive information from third-parties about the reliability of your account to prevent fraud, abuse and other harmful activity on and off our Products Information we receive about you (including financial transaction as data related to deposits and withdrawals) can be accessed and preserved for an extended period when it is the subject of a legal request or obligation, governmental investigation, or investigations of possible violations of our terms or policies, or otherwise to prevent harm. We also retain information from accounts disabled for terms violations for at least a year to prevent repeat abuse or other term violations.

## 7- WHAT IS A COOKIE AND HOW DO WE USE 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. The purpose of this information is to provide you with a more relevant and effective experience on the OXShare LLC site, including presenting web pages according to your needs or preferences. OXShare LLC 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

## 8- Link to other websites

Links to other websites The Company's website contains or may contain links to other websites or social media platforms of interest. However, once you have used these links to leave the Company's website, you should note that the Company does not have any control over those other websites. Therefore, the Company cannot be responsible for the protection and privacy of any information which you provide whilst visiting such sites and such sites are not governed by this Policy. You should exercise caution and look at the privacy statement applicable to the website in question. The Company will not be liable for the unlawful or unauthorized use of the Client's Personal Data due to misuse and/or malicious use and/or negligence and/or misplacement of the Client's passwords either by him/her or any third party

## 9- How long your personal information will be kept Data retention:

You can close your account any time, but for audit trail purposes, OXShare LLC shall hold personal data for a period of at least five years after closing the account in order for us to comply with our record keeping obligations under the Money Laundering Regulations 2017. At the end of that period, we will delete all personal data relating to you, unless a legal requirement requires them to keep the data for a prolonged period of time, or Data Subject has expressly consented to their data being held for an extended period of time.

## 10- Sharing and Disclosure of Personal Data

In the course of the performance of the Company's contractual and statutory obligations, the Client's Personal Data may be disclosed to third parties. Most of such third parties enter into contractual arrangements with the Company by which they observe data protection and confidentiality. Under the circumstances referred to above, recipients of Personal Data may be, for example:

1. third party payment service providers who help the Company provide its Clients the services of securely deposit and withdrawal to and from a Client's account;

- 3- other service providers that the Company has chosen to support it in the effective provision of its products and services by offering technological expertise, solutions and support;
- 4- governmental and regulatory bodies, including law enforcement authorities and FSB, in connection with enquiries, proceedings or investigations by such parties or in order to enable the Company to comply with its legal and regulatory requirements;
- 5- credit reference and fraud prevention agencies, third party authentication service providers and other financial institutions for the purposes of credit checking, fraud prevention and anti-money laundering controls;
- 6- third party service providers for the provision of the required customer support services through live chat and the Company's website visits and traffic monitoring through cookies;
- 7- external consultants including legal and tax consultants;
- 8- data reporting service providers;
- 9- market research companies and call centers; and
- 11- affiliates of the Company the Company does not collect, store or process any personal credit or debit card information. All payment transactions are processed through payment services providers

## 11 Marketing by us

- a- We may use your personal information to send you marketing communications by email or phone or other agreed forms (including social media campaigns) to ensure that you are always kept up to date with our latest products and services. Where we send you marketing communications we will either do so as it is in our legitimate interest or with your consent.
- b- Internal business purposes and record keeping  
We may need to process your personal information for internal business and research purposes and record keeping purposes. Such processing is in our own legitimate interests and is required in order to comply with our legal obligations. This may include any communications that we have with you in relation to the services we provide to you and our relationship with you. We will also keep records to ensure that you comply with your obligations under any contract you have entered into with us

## 12 Confidentiality and Security of Personal Data

- 1- Personal Data which the Company holds is to be treated by the Company as confidential and will not be used for any purpose other than those specified in this Policy.
- 2- Any Personal Data that the Client provides to the Company will be treated as confidential
- 3- Such Personal Data will not be disclosed to any other third party except if such disclosure is required under any regulatory or legal proceedings.
- 4- The Personal Data that the Client provides in connection with registering as a user of the website(s) or for the Services is classified as Registration Information. The Company offers high protection of the Registration Information provided by the Client. The Client can access his Registration Information through a password selected by him which is encrypted and known only to the Client. The Client must be careful and protect his password from any third parties. Registration Information is safely stored on secure servers that only authorized personnel have access to via password. The Company encrypts all Personal Data as it is transferred to the



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Company and thus makes all necessary effort to prevent unauthorized parties from viewing any such information.

- 5- Personal Data provided to the Company that is not Registration Information also resides on secure servers and is again accessible only to authorized personnel via password. This information is not accessible by the Client; therefore, no password is provided to view or modify this information.

### 13 changes to this privacy

notice This privacy notice was published on May 2021 and last updated on May 2021. We may change this privacy policy from time to time, when we do we will inform you via our Website or via email.

### 14 How to contact us

Any questions or additional information regarding our privacy policy may be directed to our Customer Service Department at [support@oxshare.com](mailto:support@oxshare.com)