

PRIVACY POLICY

BANK



SAXO BANK

PRIVACY POLICY

A graphic element consisting of a white rectangular box with a thin orange border. Inside the box, the words "PRIVACY POLICY" are written in a bold, red, sans-serif font. The text is centered and overlaid on a circular, distressed red stamp-like background. The background of the box also features a faint, light gray grid pattern.

PRIVACY POLICY

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GENERAL PROVISIONS

- This Privacy Policy applies in saxo bank (hereinafter referred to as “The Bank”) regarding private information which was got from Clients during the registration process at the official website of the Company (<https://www.saxovault.com>) and during any usage of Company services.
 - This Privacy Policy is publicly available at the website of the Company, and all Clients should familiarize with the Privacy Policy and follow all its changes.
 - During the registration process at the website of the Company, it is prerequisite that the Client analyze and accept all provisions of this Privacy Policy. Also Client gives consent for use of his/her private information in the compliance with the Law of the United Kingdom.
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CLIENT PRIVATE INFORMATION

- The Company guarantees that Client private information is under constant protection.
- The Company introduces present-day procedures and instruments of safety control regularly to provide safe and secure environment.
- The Company reserves the right to ask for all necessary documents from the Client in accordance with the laws of Ireland and local Company regulations with following purposes: to improve the quality of services, speed-up the processing of Clients requests, provide information about the company products and services, as well as to comply with the legislation on preventing the legalization of criminal proceeds, financing terrorist activities and the proliferation of weapons of mass destruction.
- The Client is obliged to provide accurate information during the registration process at the website of the Company or provide the information to the Company by any other way (in compliance with Terms and conditions of operations with non-deliverable over-the-counter financial instruments).
- The Client confirms that the documents provided during verification procedure or during private information update process are authentic and belong to the Client.
- Herewith the Client agrees that his/her private information will be kept in database of the Company.
- Private information is provided in the registration form at the site of the Company and during submission process of necessary documents.
- Private information may include but is not limited by the following points:
 - surname, name, patronymic name, date and place of birth, nationality, registration address and/or current address, identification data (passport or any other identity card), occupation, contact information and etc.;

- Documents which are necessary for verification process (passport copy or copy of any other identity card, document which confirms registration address and (or) current address, Client graphics image with the document which is opened on pages with Client private information);
- Confirmation that payment instrument belongs to the Client (copy of bank payment card).

PROCESSING YOUR DATA

- We store and process your data, including personal data in terms of the Data Protection Act (Chapter 440 of the Laws of Ireland), to the extent that this is necessary for the appropriate conduct of our business relations and conforms to the applicable statutory provisions. We only record information which serves to fulfill our duties and we do this solely within the scope of the service provided to you. In providing our services we collect, process and store data relating to you from other banks and other professionals.

INFORMATION SAFETY CONTROL

- The Company guarantees the confidentiality of Clients and their private information and assumes all possible measures for its providing, including observation of standards of security during transmission of the confidential information and usage of present-day keeping technologies. All Clients information is keeping on protected servers.
- In the Company there are internal rules of access provision to Clients private information. The access is available only for limited employees group.
- The Client is absolutely responsible for providing the confidentiality of passwords, user names and other information about access to Personal account and Platform.
- The Client is absolutely responsible for performed actions and operations with the usage of registration information.
- In the case of undesirable disclosure of information about personal login or password, the Client may change the password independently at the site of the Company. If personal information is disclosed (login or password) to the third parties due the fault of the Client, the Company is not responsible for information security and safety.
- The Company has no right to claim full bank details of the Client's payment card or similar means with the purpose to exclude any possibility of unfair data usage.

USE OF PRIVATE INFORMATION

- In accordance with the provision of Ireland Law, by accepting that the General terms and conditions of the bank and this privacy policy regulate your relationship with the bank, you consent to us

disclosing information about you acquired during the course of our relationship in the following circumstances.

1. To any of our professional advisers (including but not limited to financial, legal, management and other advisers as might be engaged from time to time), or to any of our group entities or affiliated entities, or to any consultants (including market research entities, advertising agencies) or to any actual or potential assignee or transferee of the Bank's rights against you, or to any person who may otherwise enter into contractual relations with the Bank in relation to the business relationship with you.
 2. To any person to whom we have outsourced any activities or services of the Bank, including any material and/or non-material activities and/or services of the Bank.
 3. When the information is required to be disclosed or is requested in the course of a due diligence exercise.
 4. When the information is required in the normal course of business with institutions or other persons who are normally bound by similar obligations of secrecy.
 5. Unless otherwise provided in this Privacy Policy, the General Terms and Conditions of the Bank, and/or any Specific Terms and Conditions of the Bank, the obligation of secrecy shall survive the termination of the relationship between us.
- The Client gives the right to the Company to process his/her private information in the compliance with the local regulatory act of the Company. The Client agrees with facts that the Company may collect process, keep, use information, including its transmission to the third parties (in compliance with the term directly below) and ask for additional information.
 - We may monitor and record your telephone calls with us to ensure that your instructions are accurately carried out, to help us to continually improve our services and to improve security. In the interest of security we may use CCTV recording equipment in and around our premises.
 - The transmission of the confidential information to the third parties by the Company may be carried out only for providing of service process with the guarantees of information protection, or in the compliance with related lawmaking requirements of the United Kingdom when such information is asked by administrative or law enforcement authorities, law-courts or other competent authority.

INABILITY TO COMPLY WITH THE POLICY

- The Client has the right not to provide private information to the Company.
 - The Client realizes that such refusal in private information providing to the Company may limit the range of Company services or for whatever reasons take down the level of their quality. And in some cases cancel your use of Bank of Lunar Services but we will notify you if this is the case at the time
 - If the Client does not provide full information and documents (their copies), the Company has the right to refuse the Client to create the account and (or) perform the Agreement about operations with non-deliverable over-the-counter financial instruments.
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CHANGES IN PRIVACY POLICY

- The Company has the right to change and (or) complement this Privacy Policy.