



Privacy & Cookies Policy

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STO Cyprus

Privacy and Cookies Policy Privacy Policy

This document is drafted by AFX Capital Market Ltd. (“AFX”, “we”, “us”, “our”) a company registered in Cyprus, authorised and regulated by the Cyprus Securities and Exchange Commission – CySEC with licence no. 119/10 and registration no.253014. This document implements and is compliant with the provisions of Directive DI144-2007-01 for the authorisation and operating conditions of CIFs (“the Directive”). AFX trading as STO) recognises your right to privacy as implemented in Cyprus Law, by Cyprus Law 138(I) 2001 on the Processing of Personal Data (Protection of Individuals), which as amended by the Cyprus Law of 2003 (37(I) 2003) on the Processing of Personal Data (Protection of Individuals), as the same may be in force from time to time and modified or amended from time to time and therefore we have established this policy to cover personal information (possibly including sensitive data) within the meaning of the Processing of Personal Data (protection of individuals) Law 138 (1), as amended in 2003 by Section 37 (1) 2003, and non-personal information. It is there so you and AFX Capital Markets Ltd. have a clear understanding of when and how information will be used that you or your computer provides. The provisions of this notice apply to former clients, current clients, and applicants. If you have any questions regarding its content and the effect on your information, please feel free to contact us using our live chat function on www.stofs.com or the appropriate contact details under ‘contact us’.

NOTE: This website and its contents are subject to applicable copyright and intellectual property laws. You cannot use materials from this website or alter original text without permission from AFX Capital Ltd. If you wish to request permission, please contact us.

Personal Information

Personal Information provided by you to AFX Capital Markets Ltd. by opening and/or updating an Account or whilst placing Orders and entering into Contracts, may be processed by AFX Capital Markets Ltd. for the purposes of: performing our obligations under the terms and conditions and all linked documentation, regulatory requirements, administering the relationship with you and analysing, improving and developing the trade products and services we offer.

Data provided under the above conditions may be disclosed to service providers and other suppliers (within the European Economic Area or otherwise including countries which do not offer “adequate protection” within the meaning of the EU Directives on data protection) for any purpose relating to the operation of your Account including, but not limited to, processing of instructions, generation of confirmations, operation of control systems and management of information systems, allowing staff of service providers and other suppliers who share the responsibility for managing the relationship between you and AFX Capital Markets Ltd. to view such data. AFX Capital Markets Ltd. may also disclose the above data to your introducing broker or agent, if any, as necessary to enable them to administer the relationship with you or to take any action in connection therewith.

Unless you require AFX not to do so, personal information may also be used by AFX (and shared with the parties indicated above, as necessary and other carefully selected third parties) for marketing to you

including but not exclusively sending promotional emails about new products, special offers or other information which we think you may find interesting using the email address which you have provided. To opt out of marketing material please log in to MyAccount to alter your preferences. If you have any problems please feel free to contact us using our live chat function on www.stofs.com or the appropriate contact details under contact us.

AFX may also use your information to contact you for market research purposes. We may contact you by email, phone, fax or mail. We may use the information to customise the services we provide and on the website according to your interests. We may use the information you provide to establish and publish trends, however, if we do so we will ensure that no individual is identifiable in this data.

AFX has security procedures covering the storage and disclosure of all of our Client's personal information to prevent unauthorised access and to comply with legal and regulatory obligations. Before transferring personal data to service providers, other suppliers or parties for processing or other purposes, AFX shall ensure that adequate contractual arrangements complying with applicable legal standards are in place to protect the confidentiality of the information.

You may require AFX to provide details of the personal information held about you, the purposes for which the information is processed and the persons or class of persons to whom the information is disclosed. AFX may charge a fee to provide these details to cover the cost of validating your application, tracing, retrieving, reviewing and copying any material requested, the amount of which is available upon request. You may also require AFX to correct, delete and/or block personal information from further processing if that information is inaccurate. This can be done by contacting us using our live chat function on www.stofs.com or the appropriate contact details under 'contact us'.

Subject to the foregoing, neither party may disclose to any person any information relating to the business, investments, finances or other matters of a confidential nature of the other party of which it may come into possession of in connection with this Agreement and its performance by the other party, and each party shall use all reasonable endeavours to prevent such disclosure. Notwithstanding the above, each party (the "Disclosing Party") may disclose information about the other party, this Agreement, the Account and any trade thereon as the Disclosing Party may be required by any law, rule or regulatory requirement, law enforcement or tax authority or as the Disclosing Party reasonably believes to be necessary to properly perform its obligations under this Agreement or to exercise and enforce its rights thereunder (including, without limitation, as set forth in Section 16.4 of the terms of business) without prior notice to the other party.

You do not have to provide us with any of the personal information requested by AFX. However, should you opt not to provide us with the information requested, AFX may be unable to open an account for you, where the information is requested at application stage, or may cease to be able to provide you with any other further services, information or assistance you have sought. This decision will not be taken lightly and will be done based on regulatory requirements, standard industry practice and based on the risk involved to AFX by not providing the information requested.

Cookies Policy

What Are Cookies & Why Do Websites Use Them?

Whenever you search the web or visit websites your browser stores “cookies”. A cookie, also known as an HTTP cookie, web cookie, or browser cookie, and is a piece of data (text file) sent by a website to your browser (often including a unique identifier) and is stored on your devices browser which is subsequently confirmed by being sent back to the website unchanged by your browser. Each website you use may send cookies to your computer, if your browser settings allow for this. However, to protect your privacy your browser will only permit a website to access the cookies it has already sent to you and not cookies sent by other websites.

Cookies are used for a variety of purposes for example to enable websites to "remember" where on the site your browser has been during that visit (unique session identifier) and depending on the cookie type, on your return (personalisation/tracking). Cookies allow you to access secured information, conduct secured transactions, and take advantage of promotional opportunities. Cookies are designed to help you have a better user experience when using the web and this is no different within our website. We use the information provided by cookies in the same way, for example whilst you are logged into your account to maintain your account preferences and other account specific information, to improve our site content or to monitor where you became aware of our site for possible marketing purposes.

AFX uses two types of cookies; Campaign/Performance cookies used to monitor which online campaign you visited the website through e.g. a banner on x website and these expire after 3 days and Session/Functionality cookies used to save the session configuration of a registered user for example language and as the name suggests lasts for the length of your session on the site. It is not currently possible to limit the cookies we use through our website other than through your browser. To do so, please visit aboutcookies.org for more information and instructions on how to manage cookies. Limiting cookies may affect how our website works for you. We may look to add targeting/advertising cookies in the future. Due to technological advances the cookies we use may vary over time, however, any that will increase substantially the duration the cookie remains on your device will result in an amendment in this policy. Examples of cookies used by AFX are included in the table below:

Name	Domain	Expired Date	Example value
Campaign Used to monitor the clients visit from online campaigns	my.afxcapital.com	3 days	id=2
	www.stofs.com/en		
	www.stofs.com/it		
	www.stofs.com/de		
	www.stofs.com/cn		
	www.stofs.com/ar		

ASP.NET_SessionId Used to save the session configuration of the registered user in MyAccount. For example The selected language	my.afxcapital.com	Session	1xezzesk4vxgsm3y4xmk4l3
	www.stosfs.com/en		
	www.stosfs.com/it		
	www.stosfs.com/de		
	www.stosfs.com/cn		
	www.stosfs.com/cn		
	www.stosfs.com/ar		
	www.stosfs.com/ar		

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we 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 privacy statement.

Controlling What Data Is Collected Through Cookies on Our (and other) Websites

You can control the cookies your browser accepts by altering the settings of your browser. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer, or give you the option to accept or decline each cookie before it is placed. However, rejecting cookies may reduce your access to parts of our website, including account information found behind the “MyAccount” log in. If you do not wish to accept cookies, please review your Internet browser (Internet Explorer, Firefox, Google Chrome, etc.) manual/help section to find out how to either block all cookies or receive a warning before a cookie is stored on your computer. You may wish to find out more information regarding cookies at visit www.aboutcookies.org.

Third Party Cookies on AFX Capital Markets Ltd. Pages

During your visits to AFX’s. websites, you may notice that some cookies are not related to AFX. or AFX’s contractors. When you visit a page with content embedded from, for example, YouTube or LinkedIn, you may be presented with cookies from these websites. AFX. does not control the distribution of these cookies. You should check the third party websites for more information about its privacy policy and use of cookies. Different 3rd party cookies can exist, and details of the current ones (and potential future ones) are explained below (not all cookies are linked to all our sites). Due to the nature of technology these may change, however, we will monitor this and update this policy at regular intervals:

AdForm – advertising tool used to improve performance of advertising by Internet Advertisement Bureau UK affiliated company amongst others. The privacy policy can be found at <http://www.adform.com/site/privacy-policy/>

Alexa provides information about websites including Top Sites, Internet Traffic Stats and Metrics, Related Links, Online Reviews Contact Information and Search. The privacy policy can be found at <http://www.alexa.com/help/privacy>

DoubleClick by Google - ad management and ad serving solutions to companies that buy, create or sell online advertising. The privacy policy can be found at <http://www.google.com/intl/en/policies/privacy/>

Facebook Connect and Facebook Social Plugins – make it easier to link AFX’s Facebook page to various websites and provides tools to provide people with personalised and social experiences. When you interact with social plugins, you share your experiences off Facebook with your friends and others on Facebook – e.g. the like button. The privacy policy can be found at <http://www.facebook.com/about/privacy/>

Google Analytics whose cookies and privacy policy can be found at <http://www.google.com/intl/en/privacypolicy.html> and is used to count the number of people who use the site, traffic type, the country the visitor is from, to analyse how they use it and as site verification. The privacy policy can be found here <http://www.google.com/intl/en/policies/privacy/>

Google AdWords Conversion – used in monitoring clicks through the Google advertising network allowing Google to monitor pricing. The privacy policy can be found here <http://www.google.com/intl/en/policies/privacy/>

Google Tag Manager - makes it easy to add and update website tags. The privacy policy can be found at <http://www.google.com/intl/en/policies/privacy/>

Google + 1 – click the +1 button to give something your public stamp of approval. Then, if you want to share right away, add a comment and send it to the right circles on Google+. The privacy policy can be found here <http://www.google.com/intl/en/policies/privacy/>

Optify - an Inbound Marketing Software Suite to help marketers reach more buyers and generate more demand for their business. The privacy policy can be found at <http://www.optify.net/about/privacy/>
Twitter Button - make it easier to link AFX’s Twitter Page to its website allowing visitors to easily follow AFX on Twitter. The privacy policy can be found at <http://twitter.com/privacy>

Our website may contain links to other websites of interest. However, once you have used these links to leave our site, you should note that we do not have any control over that other website. Therefore, we 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 privacy statement.

Security & Protection

AFX takes security issues very seriously. We take all reasonable steps to protect your Personal Data, including maintaining strict security standards and procedures and using leading security technologies. Using advanced encryption technology to ensure privacy and security over the Internet.

All communication through our website is encrypted using Secure Socket Layer SSL technology (Secure Socket Layer). Passwords are encoded; making sure that only you know your password. All personal information is completely confidential; we do not share your information with any third parties.

If you communicate with the Company by e-mail, you should note that the security of Internet e-mail is uncertain. By sending sensitive or confidential e-mail messages which are not encrypted you accept the risks of such uncertainty and possible lack of confidentiality over the Internet. The Internet is not 100% safe and someone may be able to intercept and read your details.

Employees

All our staff members who deal with clients' personal information receive the appropriate training to ensure they are aware of the obligations placed on them through this policy.

Raising a Concern

Should you have any concerns that AFX has not met the requirements of this policy we encourage you to inform us as soon as possible. Such concerns will be raised as a dispute under our complaints procedure and will be fully responded to in accordance with that policy. Please do not be afraid to raise a concern regarding an individual staff member or the company as a whole as your feedback ensures the protection of all our clients and the reputation of AFX. For more information on raising your concern, please see our complaints procedure.

If you are not satisfied with our response to your complaint, you can telephone the Cyprus Securities and Exchange Commission on +357 22 506600, or visit www.cysec.com, or <http://www.cysec.gov.cy/> for more information on whether the Cyprus Securities Exchange Commission can look into your concerns.

AFX. may make changes to this Cookies Policy from time to time for legal, regulatory or for enabling further clarification. Should this happen AFX will notify you of such changes by placing an updated version of this policy on the website. Please note AFX. is not responsible for providing individual notifications of changes. You are responsible for regularly reviewing this policy. If you use this website or other service we provide to you following any changes taking affect you shall be classed as agreeing to those changes. AFX may change this privacy and cookies policy from time to time by updating this page. You should check this page from time to time to ensure that you are happy with any changes.

AFX reviews and monitors this document in an on-going basis having regard to the present Directive and relevant Circulars provided by CySEC.