

# PRIVACY AND REFUND POLICY

## 1. INTRODUCTION

- 1.1. **Gulf Brokers Ltd.** (the “Company”), is committed to protect your privacy and handling your data through a transparent manner. The Company understands the importance of maintaining the confidentiality and privacy of your personal data. By entrusting us with your information, we would like to assure you of our commitment to keep such information private. The Company taken measurable steps to protect the confidentiality, security, and integrity of Your Information.

## 2. DEFINITIONS AND INTERPRETATION OF TERMS

- 2.1. The Company will only use your personal data in accordance with worldwide data protection practices.
- 2.2. The Company will collect and hold personal data about you when you complete an online application for a live or demo account or other type of form or when participating in any other offer the Company promotes through its website [www.goldenbrokers.my](http://www.goldenbrokers.my).
- 2.3. The Company collects certain personal data in order that it may meet the needs of its Clients through the efficient provision of services. By collecting certain personal data, the Company is able to monitor and improve the services which is offers to its existing and potential Clients.
- 2.4. Personal data collected includes but is not limited to:
- Personal details such as name, address, telephone number and/or email address;
  - Financial details such as estimated annual income and net worth, trading experience and investment knowledge;
  - Identify Verification Documents such as passport and ID, utility bills, and/or bank statements or your company incorporation certificates/details.
- 2.5. The Company may derive information from your use of this website and may store this information with your personal profile. This information may include site areas visited, pages viewed, frequency and duration of visits, types of transactions conducted, documents downloaded and other websites which may have referred you or to which you link.

## 3. TO WHOM THE COMPANY MAY DISCLOSE YOUR INFORMATION

- 3.1. As part of using your personal information for the purposes set put above, we may disclose your information to:
- Service providers and specialist advisers who have been contracted to provide us with IT, financial, regulatory, compliance, accounting and/or other services;
  - Contracted Introducing Brokers with whom the Company has closed relationships and who are exclusively working for the Company;



- Regulatory Authorities;
  - Anyone authorised by you;
  - Relevant authorities to investigate or prevent fraud, money laundering or other illegal activity;
  - The Company's employees so as to exercise their duties to further the Agreement between us, or to assure the efficient functioning of our Platform, the Automatic Orders and the Trading Data functions.
- 3.2. The Company requires from organisations outside the Company who handle or obtain personal information to acknowledge the confidentiality of this information, undertake to respect any individual's right to privacy and comply with all the relevant data protection laws and this privacy notice.

#### 4. USE OF PERSONAL DATA

- 4.1. The Company may use your information for any one or more of the following purposes:
- To confirm your identity;
  - To maintain your personal profile;
  - To access your suitability to the products and services we provide;
  - To provide the services to you that you have requested including processing transactions;
  - To provide you with transaction and post transaction related services;
  - To inform you of products and/or services that may be of interest to you;
  - To keep you updated on the issues that are relevant to your business relationship with us;
  - To tailor the website to your needs and interests;
  - To analyze impersonalized statistical data to enable us to provide you with better products and/or services;
  - To administer your account and monitor its conduct and assess and analyze any credit limit, including, the interest rate, fees and other charges to be applied to the Client's Account;
  - To pass your personal data to third parties for marketing purposes without prior written consent;

#### 4.2. Retention of Personal Data

The Company will, as required by law, retain your Personal Data on record for a period of at least five (5) years, which is calculated after the execution of the transactions or the termination of the business relationship or in case of termination of our business relationship.

#### 4.3. Monitoring and Recording

The Company will, as required by law, monitor and record any communication you have with us whether in writing, by phone or by electronic mail.

#### 4.4. Consent

You consent to the Company using your personal data for the above-stated purposes

#### 5. YOUR RIGHTS

- 5.1. You are not obligated to provide any of the personal data requested by the Company. In the absence of this information, however, the Company may not be able to open an account for



you where the information is requested in on an application form, or to provide you with any other services, information or assistance you have sought.

- 5.2. Under the protection legislation, you have (subject to certain exceptions) the right to request any personal data the Company holds about you and to inform the Company of any perceived inaccuracy. We may charge a fee to cover the associated administrative costs.
- 5.3. You may inform the Company at any time that your personal details have changed or that you wish the Company to delete personal data we hold about you by emailing us. The Company will change or delete your personal data in accordance with your instructions, except to the extent that we are required to hold your personal data for regulatory or legal purposes, to provide you with the services you have requested or to maintain adequate business records.
- 5.4. If you have any questions, complaints or requests, please write to the Company, verifying your identity and setting out in full what information you require. If a complaint is not resolved by the Company to your satisfaction, you may complain to the Information Commissioner.

## **6. CONSENT**

- 6.1. The use of your personal information requires your consent, such consent will be provided in accordance with the Client Agreement that it is provided to you during the account opening procedure and is also available on the Company's website(s).
- 6.2. The Company shall rely on the provided consent as its legal basis for processing your personal data. You have the right at any time to withdraw that consent by contacting us via phone or via email.

## **7. SECURITY**

- 7.1. The Company adopts strong measures to protect the security of your Personal Data and to ensure it is not accessed by unauthorized persons. Access to Personal Data is restricted to employees and authorized service providers who need it to perform their work. You must not share or disclose your log in details with any third party.
- 7.2. The Company takes strong precautions to protect your personal data from loss, theft, copying, misuse, unauthorized access or disclosure, alteration, or destruction. Measures include encryption during data transmission, strong authentication mechanisms and separation of machines and data to provide secure areas.

## **8. RETURN POLICY**

- 8.1. We do not cancel realized trade transactions. So, in this respect we would like to stress out that before you place and order you should have a clear understanding that a refund is not possible.  
Therefore, the full refunds can only be issued by us if the funds that were deposited in the trading account were not used to open any trades. In this case the full refund is possible. Further to that we issue refunds in case of withdrawals from the trading account.



In unlikely situation when client did not open any position and a financial loss occurred in the trading account as a direct result of misconduct of any of the employees, we will issue a full refund.

## **9. AMENDMENTS OF PRIVACY AND REFUND POLICY**

- 9.1. The Company reserves the right to make changes this Privacy and Refund Policy from time to time for any reason and will notify you of such changes by posting an updated version of this Privacy Policy on this website. You are responsible for regularly reviewing this Privacy Policy and if you use this website after any such changes are published, such use shall constitute your agreement to such changes.

## **10. LANGUAGE**

- 10.1. Language of communication between the Company and the Client shall be in English. All binding contractual documentation is available in English.
- 10.2. Upon its sole discretion the Company, may communicate with the Client in other language than English, however in case of any discrepancy between the meanings of any communications and/or meanings, or any other communications forming part of this Privacy Policy or any other agreements, information or communication in any other language, the meaning of the English Language version shall prevail.
- 10.3. The Company or third parties may have provided the Client with translations of this Privacy Policy. The original English versions shall be the only legally binding version. In case of discrepancies between the English version and other translations in the Client's possession, the original English version provided by the Company on the website shall prevail.

