

**Effective from 22.09.2018 and until further notice.**

Academy (“us”, “we”, or “our”) operates [academy.avatrade.com](https://academy.avatrade.com). Protecting the privacy and safeguarding the personal and financial information of our clients and Web site visitors is one of our highest priorities. The following Privacy Statement explains how we collect and protect your information. By opening an account and/or by using our Web site, you give your consent to the collection and use of personal information by us as explained in this privacy statement.

We use your Personal Information only for providing and improving the Site. By using the Site, you agree to the collection and use of information in accordance with this policy.

# 1. Collection of Personal Information

While using our Site or opening an account, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you.

Personally identifiable information may include, but is not limited to your name (“Personal Information”).

We collect information required to open a user account, to transact business effectively and to safeguard your privacy. To do this, we gather information to help us assess your needs and preferences. The information we collect directly from you includes information required to communicate with you, including your name, mailing address, telephone number, e-mail address and to identify who you are. We also collect demographic information when you open an account, including, birth date, education, occupation, etc.

When you visit our Website, we will collect and process Personal Data including:

- the name of the domain and host from which you access the internet
- the internet protocol (IP) address of the computer which you are using
- the browser software you are using

- the operating system you are using
- the date and time at which you access the Website.

## 2. Legal Basis for Processing Personal Data

### a. Collecting personal data based on consents

The collection of personal data based on consent from the data subject will be done by using “Consent Forms” that will store documentation related to the consent given by the individual. Individual consents will always be stored and documented in our systems.

### b. Collecting personal data based on contracts

We use personal information for fulfilling our obligations related to contracts and agreements with customers, partners and suppliers.

### c. Collecting personal data based on legitimate interest

We may use personal data if it is considered to be of legitimate interest, and if the privacy interests of the data subjects do not override this interest. Normally, to establish the legal basis for data collection, an assessment is made, during which a mutual interest between us and the individual person has been identified.

## 3. Usage of Personal Information

We use personal information only as appropriate to provide you quality service and security. For example, we may use the information collected from you to verify your identity and contact information. This information helps us improve our services to you,

customize your browsing experience and inform you about additional products, services or promotions that may be of interest to you.

## 4. Our Affiliates and Partners

We may share information with affiliates if the information is required to provide the product or service you have requested or to provide you the opportunity to participate in the products or services our affiliates offer. We may also forge partnerships and alliances, which may include joint marketing agreements, with other companies who offer high-quality products and services that might be of value to our clients. In order to ensure that these products and services meet your needs and are delivered in a manner that is useful and relevant, we may share some information with partners, affiliates and alliances. This allows them to better understand the offers that are most relevant and useful. The use of your personal information is limited to the purposes identified in our relationship with the partner or affiliate.

## 5. Non-Affiliated Third Parties

We do not sell, license, lease or otherwise disclose your personal information to any third party for any reason, except as described below.

We reserve the right to disclose your personal information to third parties where required by law to regulatory, law enforcement or other government authorities. We may also disclose your information as necessary to credit reporting or collection agencies, or when necessary to protect our rights or property.

To help us improve our services to you, we may engage another business to help us to carry out certain internal functions such as account processing, fulfillment, client service, client satisfaction surveys or other data collection activities relevant to our business. We may also provide a party with client information from our database to help us to analyze and identify client needs and notify clients of product and service offerings. Use of the information shared is strictly limited to the performance of the task

we request and for no other purpose. All third parties with which we share personal information are required to protect personal information in a manner similar to the way we protect personal information.

## 6. Restriction of Responsibility

If at any time you choose to purchase a product or service offered by another company, any personal information you share with that company will no longer be controlled under our Privacy Statement. We are not responsible for the privacy policies or the content of sites we link to and have no control of the use or protection of information provided by you or collected by those sites. Whenever you elect to link to a co-branded Web site or to a linked Web site, you may be asked to provide registration or other information. Please note that the information you are providing is going to a third party, and you should familiarize yourself with the privacy policy provided by that third party.

## 7. Your Rights

You have a number of rights regarding access to and control of your Personal Data, including:

- The right to request a copy of your personal data that we hold about you
- The right to request that we correct your personal data if inaccurate or out of date
- The right to request that your personal data is deleted when it is no longer necessary for us to retain such data for legal and contractual purposes
- The right to withdraw any consent to personal data processing at any time
- The right to request that we provide you with your personal data and, if possible, to pass on this information directly (in a portable format) to another data controller when the processing is based on consent or contract
- The right to request a restriction on further data processing, in case there is a dispute in relation to the accuracy or processing of your personal data

- The right to object to the processing of personal data, in case data processing has been based on legitimate interest and/or direct marketing
- The right to complain to us and/or the relevant Data Protection Authority in your jurisdiction
- You can submit your request or complaint to following email:  
[academy@avatrade.com](mailto:academy@avatrade.com)

## 8. Use of “Cookies”

We use cookies to assist us in securing your learning activities and to enhance the performance of our Web site. (Cookies are small text files sent from the Web server to your computer.) Cookies used by us do not contain any personal information nor do they contain account or password information. They merely allow the site to recognize that a page request comes from someone who has already logged on.

We may share Web site usage information about visitors to the Web site with reputable advertising companies for targeting our Internet banner advertisements on this site and other sites. For this purpose, pixel tags (also called clear gifs or web beacons) may be used to note the pages you have visited. The information collected by the advertising company through the use of these pixel tags is not personally identifiable.

To administer and improve our Web site, we may use a third party to track and analyze usage and statistical volume information, including page requests, form requests, and click paths. The third party may use cookies to track behavior and may set cookies on behalf of us. These cookies do not contain any personally identifiable information.

For more information on how we use cookies, please see our [Cookie Policy](#).

## 9. Communications

Unless otherwise indicated for a particular service, any communications or material of any kind that you e-mail or otherwise transmit through the services, including

information, data, questions, comments or suggestions (your “Communications”) will be treated as non-proprietary and non-confidential.

## 10. Changes to This Privacy Statement

From time to time, we may update this Privacy Statement. In the event we materially change this Privacy Statement, the revised Privacy Statement will promptly be posted to the Web sites and we will post a notice on our Web sites informing you of such changes. You agree to accept posting of a revised Privacy Statement electronically on the Web site as actual notice to you. Any dispute over our Privacy Policy Statement is subject to this notice and our Customer Agreement. We encourage you to periodically check back and review this policy so that you always will know what information we collect, how we use it, and to whom we disclose it. If you have any questions that this statement does not address, please contact a Client Services representative.