Fort Securities BLR LLC

# APPROVED BY

Director

Fort Securities BLR LLC

(signed) O.V. Volkov

March 27, 2019

Round seal affixed: "Fort Securities BLR" \* Limited Liability Company \* Minsk \* Republic of Belarus

Privacy Policy

Minsk

2019



# **Privacy Policy**

# 1. General provisions

1.1. This Privacy Policy applies in Fort Securities BLR LLC (hereinafter referred to as "Company") regarding private information which was got from Clients during the registration process at the official website of the Company (www.fortrade.com) and during any usage of Company services.

1.2. 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.

1.3. During the registration process at the website of the Company Client is obliged to 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 Republic of Belarus "About information, informatization and information protection" No. 455-3 dated 10.11.2008.

### 2. Client private information

2.1. The Company guarantees that Client private information is under constant protection.

2.2. The Company introduces present-day procedures and instruments of safety control regularly to provide safe and secure environment.

2.3. The Company reserves the right to ask for all necessary documents from the Client in accordance with the laws of the Republic of Belarus 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.

2.4. The Client is obliged to provide an 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).

2.5. The Client confirms that the documents provided during verification procedure or during private information update process are authentic and belong to the Client.

2.6. Herewith the Client agrees that his/her private information will be kept in database of the Company.

2.7. Private information is provided in the registration form at the site of the Company and during submission process of necessary documents.

2.8. 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).

#### **3.** Information safety control

3.1. 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.

3.2. In the Company there are internal rules of access provision to Clients private information. The access is available only for limited employees group.

3.3. The Client is absolutely responsible for providing the confidentiality of passwords, user names and

LLC "Fort Securities BLR", registration number 193075810, registered with the Minsk City Executive Committee on 08.05.2018. Address: 144 Mayakovskogo str., Unit 8, Office 11, 220028 Minsk, the Republic of Belarus other information about access to Personal account and Platform.

3.4. The Client is absolutely responsible for performed actions and operations with the usage of registration information.

3.5. 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.

3.6. The Company has no right to claim full bank details of the Client's payment card with the purpose to exclude any possibility of unfair data usage.

# 4. Use of private information

4.1. 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 cl. 4.2.), and ask for additional information.

4.2. 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 Republic of Belarus when such information is asked by administrative or law enforcement authorities, law-courts or other competent authority.

# 5. Refusal in private information providing

5.1. The Client has the right not to provide private information to the Company.

5.2. 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.

5.3. 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.

# 6. Changes in Privacy Policy

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