

Fortrade Canada Limited (“Fortrade”) ensures all personal information is protected at all times, whether for prospective, actual or withdrawn clients. The Privacy Policy below describes and explains how Fortrade handles the collection, management and the protection of clients’ personal information. Fortrade takes security very seriously and adopts industry and information technology best practices to protect your personal information and ensures that your right to privacy is not infringed in any way and that your personal information is not accessed by any unauthorised persons.

Information we may collect about you

The collection of personal information (your full name, address, IP address, cookies, phone number, email, date of birth, country of residence and citizenship, ID details) is required for Compliance and Regulatory purposes when you submit a request via our online applications, in order for us to be able to communicate with you and, as required by law, to identify who you are in accordance with Anti Money Laundering Regulations.

We obtain this information through your use of our services or other dealings with Fortrade including through any of our website, apps, the account opening applications, demo sign up, webinar sign up, subscribing to news updates and from information provided in the course of ongoing customer communication.

In addition, when you interact with our services, our servers keep an activity log unique to you that collects certain administrative and traffic information including: source IP address, time of access, date of access, web page(s) visited, language used, software crash reports and type of browser used. This information is essential for the provision and quality of the services.

We may also create analytical data derived from your use of our services, such as Google Analytics, Google AdWords or engaging in online behavioural advertising (OBA) or interest-based advertising. We treat analytical data as personal information only when it is associated with an identifiable individual.

We do not collect personal information about you while using the services other than as described in this Privacy Policy.

Data Protection and Regulation

We only use your personal information in accordance with the Personal Information Protection and Electronic Documents Act and applicable provincial substantially similar law. As a company operating under the laws of Ontario and British Columbia, we use your personal information in accordance with such Rules, including any applicable IIROC rules. This means that personal information we collect will only be:

- Used lawfully, fairly and in a transparent way;
- Collected for reasonable purposes and not used and disclosed in any other way;
- Used and disclosed for the relevance and the purposes you have been made aware of;
- Accurate and kept up to date;
- Kept only as long as necessary for the purposes we informed the client about;
- Kept securely.

How we use the information

Fortrade may use information for any one or more of the following purposes:

- To provide the services and products to you as a client;
- To confirm your identity in line with the applicable Know Your Client Rules;
- To maintain your personal profile;
- To manage your account.
- To contact you when necessary in relation to the services provided to you;
- To keep you updated with useful information, marketing material and with regards to your activities with Fortrade, including your trading activity;

- To manage the services provided to you;
- To manage the products provided to you and to tailor the website or services provided;
- To develop products and services provided to you;
- Subject to your consent, to provide you with information that we may believe are relevant to you;
- To create statistical data;

By agreeing to this Privacy Policy, you consent to Fortrade using your personal information for the above-stated purposes.

Your personal information may be transferred to countries outside Canada, such as the United Kingdom where our servers are based. As a result, you understand that your personal information will be subject to the laws of other jurisdictions than Canada and may be available to foreign government authorities under lawful orders and laws applicable in such jurisdictions. Please note that Fortrade only transfers personal information to organisations outside Canada if Fortrade has assessed the organisation as having appropriate controls and safeguards in place to protect your personal information.

Confirming your identity

Fortrade has to comply with money laundering regulations, which requires us to verify our clients' identity and residential address. We therefore request clients to provide us with a scanned (or photographed) copy of your verification documents. Alternatively, we may use a credit reference agency to verify your identity. Any such search will remain confidential and will not be seen or used by lenders to assess your ability to obtain credit.

Disclosure of your information

Fortrade does not sell or lease your personal information. We only disclose personal information to third party affiliates or non-affiliates for the reasons described below:

- In order to occasionally provide you with information on products and services you have requested;
- Subject to your right to withdraw consent, to offer you an opportunity to participate in the products and services our reputable affiliates offer, in which case we may share your information with them;
- If required to do so by a regulatory authority or court of a competent jurisdiction, or as otherwise permitted or required by law;
- To enable us to provide you with our services as well as to improve our services;
- For the purpose of credit checks or identity checks carried out by third parties on Fortrade's behalf and as required by our internal policies to adhere with rules and regulations;
- To any organisation at your request or any persons acting on your behalf, including your financial adviser, broker, solicitor or accountant;
- Where this is necessary to process a transaction or provide services which you have requested;
- To a third party in connection with a sale or transfer of business or assets, an amalgamation, re-organization or financing of parts of our business. However, in the event the transaction is completed, your personal information will remain protected by applicable privacy laws. In the event the transaction is not completed, we will require the other party not to use or disclose your personal information in any manner whatsoever and to completely delete such information. Fortrade will endeavour to make such disclosures on a 'need-to-know' basis, unless otherwise instructed by a regulatory authority. Under such circumstances, Fortrade shall expressly inform the third party regarding the confidential nature of the information.

Changes in this Privacy Policy

Fortrade reserves the right to change or amend this Privacy Policy from time to time to take into consideration changes in:

- New technology;
- Operations;
- Practices, laws and regulations.

The latest and most current Privacy Policy on Fortrade's website will govern personal information we hold on you as a client. If we decide to change our Privacy Policy, we will post those changes to this Privacy Policy, on the website, and other places we deem appropriate so that you are aware of what information we collect, how we use it, and under what circumstances, if any, we disclose it. If the changes are significant, we will provide a more prominent notice.

How long do we store personal information?

Personal information will be retained only as long as necessary for the fulfilment of the purposes for which it was collected and for which consent was received, unless otherwise required by law. When we consider that personal information is no longer needed, we will remove any details that will identify you or we will securely destroy the records. However, we may need to maintain records for a significant period of time, as required by law. According to IIROC rules, it is mandatory for Fortrade to maintain documentary evidence of compliance for a period of seven years from the date the record is created. This applies in relation to the following activities:

- Client account openings
- Compliance with the Know Your Client (KYC) rule and suitability requirements
- Correspondence with clients
- Compliance and supervision activities of the firm

Security of Personal Information

We respect the privacy of any user that accesses our website. Safeguarding the privacy of your information is important to us, whether you interact with us personally, by phone, by mail, over the internet or any other electronic medium. We hold personal information in a combination of secure computer storage facilities and paper-based files and other records, and take steps to protect the personal information we hold from misuse, loss, unauthorised access, modification or disclosure.

Links to third party websites

Our website or our apps may have links to external third party websites. Please note, however, that third party websites are not covered by this Privacy Policy and those sites are not subject to our privacy standards and procedures. Please check with each third party as to their privacy practices and procedures.

Cookies

A cookie is a small piece of text file stored on your computer or device when you visit a website or an app for the purpose of record keeping. Fortrade uses cookies on its website. We use cookies on our website or our apps to provide you with a more relevant and effective experience, including presenting web pages according to your needs or preferences.

When cookies are used by us, they collect statistical and factual information about how you use our services. Most internet browsers are set up to accept cookies. If you do not wish to receive cookies, you may be able to change the settings of your browser to refuse all cookies or to have your computer notify you each time a cookie is sent to it, and thereby give yourself the choice whether to accept it or not. However, this may impair the quality of the services that we provide to you in relation to your account.

Opting-out

If you no longer wish to receive any communication from Fortrade, you may opt-out by simply clicking on the unsubscribe link placed in the end of every email communication we send. Please note that even if you opt-out of promotional communications, we may still need to contact you with important information about your account.

Withdrawing Consent

You may withdraw consent from us to process and retain your personal information, subject to legal or contractual restrictions and reasonable notice. However, without such consent, Fortrade may limit the services or products it is able to provide customers.

Access to Personal Information

To make a request, please write to us, verifying your identity and specifying what information you require. We may charge a fee to cover the cost of verifying the application and locating, retrieving, reviewing and copying any material requested, to the extent permissible by applicable law. We will acknowledge your request and respond to it within 40 days of receipt of your application and any applicable fee.

Enquiries

If you have any questions not covered in our Privacy Policy or any other concerns about how we use your personal information, please feel free to contact us either by mail at Fortrade Canada Limited, 1200 Waterfront Centre 200 Burrard Street, P.O. Box 48600 Vancouver Bc V7x 1t2 Canada, or by email: compliance@fortrade.com

Legal Disclaimer

Fortrade reserves the right to disclose personal information to non-affiliated third parties for regulatory or reporting purposes as required by law, to protect our rights or property and when Fortrade believes that disclosure is necessary to protect our rights and/or to comply with any judicial and/or other proceedings, court order, legal process served or pursuant to governmental, intergovernmental and/or other regulatory bodies. Fortrade shall not be liable for misuse or loss of personal information and/or otherwise on Fortrade's website that Fortrade does not have access to or control over.