



PRIVACY POLICY

CONTENTS

Commitment.....	3
Personal Information.....	3
Cookies.....	6
Security and Protection of Personal Information.....	7
Consent.....	7
Queries.....	7

This Policy describes how Axel Private Market Limited collects, uses, protects and retains information regarding Clients and other persons who access our website, whether that person is a former, existing, potential Client or just a visitor to our website.

1. COMMITMENT

Your privacy is of the utmost importance to us. We are committed to safeguarding your privacy, including any information provided to us through our website.

2. PERSONAL INFORMATION

Personal information is collected in order for us to perform the services we offer efficiently and accurately and provide you with the best possible service.

When and what personal information is requested

Personal Information includes any information provided to us during the course of any interaction by yourself with our website or otherwise. We will request you to provide certain information, generally when you open a demo or live account (registration process) and in accordance to regulatory requirements which will assist us in establishing your proof of Identity and proof of your residential address, we will also require you to provide us with your date of birth, email address, telephone number, details of your current employment, salary, source of income and your trading experience, knowledge and risk tolerance.

Failure to provide

It is your choice to provide us with the information required and requested, however any missing information may result in us being unable to provide you with our services.

Data Retention

The period of personal data processing, including the period of storage shall be determined in accordance with:

- the retention period of the documents containing personal data, which is determined by the legislative requirements of the United States;

- the term of a contract (agreement) concluded between the Controller and the personal data subject, unless otherwise provided for by the applicable legal and/or legislative framework of the United States.

The retention period of the documents containing personal data, and, information on the files in which the Personal Data is kept, shall be specified in the file register, which is prepared for reasons of organized safekeeping of such documents, in accordance, interlinear, with the internal Procedures Manual and other Controller`s internal respective policies and procedures and relevant to the following periods:

- a) United States' laws regarding the provision of investment services – 5 years;
- b) Prevention of money laundering and financing terrorism legislation – 5 years since the end of the Controller's relationship with the client/counter-party or since the carrying out of the last transaction;
- c) Tax purposes – 6 years from the termination of the relationship;
- d) FATCA – 6 years starting from the end of the year when FATCA status of the client/counter-party is identified.
- e) CRS – 6 years from the moment of identification of the country, where the client or its controlling persons are tax residents

Use of your information

The collection of any personal information will be used to: establish and maintain our relationship, assess your suitability to the products and services we offer; improve our website, contact you with pertinent information about Axel Private Market Limited, our service and any promotional offers, analyse statistical information in order for us to improve our services.

3rd Party Disclosure

We will not, without your prior consent, disclose your personal information to any 3rd party unless we are required to do so by Law in order to comply with any legal obligations; are acting in good faith when such action is required to protect you or us from potential fraud; are required in order to maintain 3rd party service provider agreements with companies that perform support services for your account or facilitate your transactions with us including those that provide professional, legal or accounting advice to us. In any situation we will only disclose information which is necessary and any 3rd party shall be prohibited from using any information for any other purpose other than to fulfill our agreement.

Access To Personal Data

You have the right to request access to the information we have on you. You can do this by contacting us to support@axelprivatemarket.com. We will make sure to provide you with a copy of the data we process about you. In order to comply with your request, we may ask you to verify your identity. We will fulfil your request by sending your copy electronically, unless the request expressly specifies a different method. For any subsequent access request, we may charge you with an administrative fee.

Your rights regarding your personal data

In accordance with the Global Data Protection Regulation (GDPR) clients have the following rights:

- the right to be informed;
- the right of access;
- the right to rectification;
- the right to erasure;
- the right to restrict processing;
- the right to data portability;
- the right to object;
- the right not to be subject to automated decision-making including profiling.

In respect to the Client's rights, the Company informs you that you are able to exercise the above mentioned rights if this does not contradict the legal requirements in relation to the Prevention of Money Laundering and Terrorist Financing Laws, Record Keeping obligations

of the Company etc. Furthermore, clients have the right to be notified on a potential breach of personal data by the data controller:

Where a personal data breach is likely to result in a high risk to the rights and freedoms of a data subject, the controller must communicate the breach to the data subject without undue delay. The communication must describe in clear and plain language, the nature of the breach and at least:

- the name and contact details of the relevant Data Protection Controller;
- the likely consequences of the data breach; and
- measures taken or proposed by the controller to address the breach and/or mitigate its effects.

There is, however, no requirement to make a notification to the data subject where any of the following conditions have been met:

- technical and organizational measures have been applied to the personal data which will render it unintelligible to unauthorized persons (such as encryption);
- the controller has taken steps to ensure the originally high risk is no longer likely to materialize; or
- if notifying each data subject would involve disproportionate effort, in which case a public communication or other method of information is used which would inform the affected data subjects in a similarly effective manner.

3. COOKIES

Cookies are small bits of information written to your hard disk (more precisely in your browser folder) when you visit the website. We use cookies to help us provide you with a personalized service, and to help make our website, applications and services better for you.

The cookies we use do not save any personal data or any other type of information that may identify you. You can choose to disable your web browser's ability to accept cookies. However, if you do choose to disable your web browser's ability to accept cookies, you may not be able to access or take advantage of many features of the service and some parts of the website may not work properly.

4. SECURITY AND PROTECTION OF PERSONAL INFORMATION

Axel Private Market Limited takes the responsibility of ensuring your personal information is kept confidential, very seriously. We have taken all reasonable steps to protect your information by implementing and maintaining strict security measures and procedures and by use of leading security technology. Any password which has been given to you for access to any of your account(s) is encoded and strict procedures are in place to ensure that only you know your password. Therefore, you should ensure that no other person has access to your password. If we become aware of someone other than yourself gaining access to your account(s), we will be obligated to freeze your account(s). Should you communicate with us via email it should be noted that the security of internet e-mailing is not completely safe, we have encrypted communication via our website using SSL technology, however if you do not use such technology then another person may be able to intercept and read your emails, should any email sent by you contain any sensitive and confidential information then you accept this possible risk.

5. CONSENT

By accessing our website you consent to Axel Private Market Limited to collect, keep, maintain, use and disclose your personal information in accordance to this policy. We reserve the right to make changes to this policy any time, we ask you to review this policy frequently. If any of the changes made are of material importance then we will notify you by email or by means of a notice on our home page.

6. QUERIES

Should you have any questions or concerns relating to this policy, please do not hesitate to contact us at support@axelprivatemarket.com.