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PRIVACY POLICY

At ICM Trader LLC, we are committed to maintaining the highest standards of integrity. In the course of our business, it is necessary to collect Personal Information about our potential clients. We take this activity seriously and seek to provide fair, secure and appropriate methods for the handling of Personal Information. All such activities are intended to be consistent with both generally accepted privacy ethics and standard business practices. Your Personal Information may be shared with a limited number of trusted partners and/or affiliates of ICM where such use is restricted to the management of your account and will not breach any elements of the EU General Data Protection Regulation (GDPR). If you have any questions or comments about ICM Trader LLC Privacy Policy, you can contact our Customer Support Team: support@icmtrader.com or +44 207 442 5610.

PERSONALLY IDENTIFIABLE INFORMATION

ICM Trader LLC shall process your personal data as a Data Processor when you specifically opt-in and provide us with your consent, during your application to open a trading account. ICM Trader LLC has a lawful base for processing your data, and it is for the following reason; 'processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into the contract.'

If you open a trading account with ICM Trader LLC, you will be asked for information regarding your name and address, employment and salary details. As part of the Money Laundering Regulations 2017, and ICM Trader Limited's regulatory requirements, policies and procedures, we are required to establish proof of your identity and address during the onboarding stage. This process is conducted mainly by ICM Trader LLC by requesting, and processing copies of your personal identifiable information, but also involves the use of third parties who conduct electronic verifications on our behalf. You might be asked to supply additional information to support any unsuccessful verification attempts. Where stated we may use the personal information you provide to contact you in the future about ICM Trader LLC products and services. We only hold data which is necessary to offer the services provided on our website.

THIRD PARTY SITES

This website contains links to other websites. Please note that ICM Trader LLC cannot be held responsible for the privacy policies of other websites. We encourage all visitors to be aware and read the privacy statements of every website that collects personally identifiable information. ICM Trader LLC can confirm that it has a strict policy of not sharing your Personal Identifiable Information with an unauthorized third party under any circumstances.

PRIVACY STATEMENT CHANGES

ICM Trader LLC may change this privacy statement at any time. If a change does occur, you will be notified accordingly, and where applicable your consent would be required. You are advised to read the statements so that you are satisfied with the privacy conditions under which you provide ICM Trader LLC with your personal information.

EU GENERAL DATA PROTECTION REGULATION (GDPR)

ICM Trader LLC as a Data Processor is voluntarily committed to comply with the requirements and principles of GDPR in processing your personal identifiable information.

We will safeguard information in our custody. We have developed and will maintain security procedures to safeguard Personal Information against loss, theft, copying, and unauthorised disclosure, use or modification. Access to Personal Information is restricted to employees and authorised service providers who need it to perform their work.

COOKIES

How is your Personal Information collected by our website?

Personal Information may be submitted to both the public and private areas of our website. Personal Information may be submitted on our website in two areas:

- **Public Area**

If you do provide your name and address on the public area of this website in order to request information about our products and services, you may voluntarily provide additional personal information. You will be asked to provide your Personal Information in this area for the purposes of registering with ICM Trader LLC and opening an account with us.

- **Private Area**

To ensure a good quality of service we may monitor and record any communication you have with us whether in writing, by phone or by electronic mail. E-mail is not encrypted to / from either the public or private areas of this website. ICM Trader LLC recommends that you do not send us Personal Information by e-mail. How we use Cookies on our Site and what Information we collect. For information about cookies please refer to www.allaboutcookies.org.

- **Session Cookies**

We use session cookies for the following purposes:

To allow you to carry information across pages of our site and avoid having to re-enter information. Within registration to allow you to access stored information.

Non personal data for tagging purposes only (by random number).

- **Persistent Cookies**

We use persistent cookies for the following purposes:

To help us recognise you as a unique visitor (just a number) when you return to our website and to allow us to tailor content or advertisements to match your preferred interests or to avoid showing you the same adverts repeatedly.

To compile anonymous, aggregated statistics that allow us to understand how users use our site and to help us improve the structure of our website.

To internally identify you by account name, name, email address, customer ID, currency and location (geographic and computer ID/IP address).

To differentiate users who are on the same network to enable us to correctly allocate bets to the

appropriate account.

Within research surveys to ensure you are not invited to complete a questionnaire too often or after you have already done so.

• **Third Party Cookies**

Third parties serve cookies via this site. These are used for the following purposes:

To serve advertisements on our site and track whether these advertisements are clicked on by users.

To control how often you are shown a particular advertisement.

To tailor content to your preferences.

To count the number of anonymous users of our site. For website usage analysis.

• **Use of Web Beacons**

Some of our Web pages may contain electronic images known as Web beacons (sometimes known as clear gifs) that allow us to count users who have visited these pages. Web beacons collect only limited information which including a cookie number, time and date of a page view, and a description of the page on which the Web beacon resides. We may also carry web beacons placed by third party advertisers. These beacons do not carry any personally identifiable information and are only used to track the effectiveness of a particular campaign.

• **Disabling/Enabling Cookies**

You have the ability to accept or decline cookies by modifying the settings in your browser. However, you may not be able to use all the interactive features of our site if cookies are disabled. To find out how to enable/disable cookies see www.allaboutcookies.org.