



Finance Managers Co. Limited Privacy Policy



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Privacy Policy

Finance Managers Co. Limited place a high priority on the protection and safeguard of our client's personal and financial information. In order to open and maintain customer accounts, we obtain and hold personal information. This policy outlines how we manage such information to ensure we meet our obligations to our customers' privacy.

Why do we collect your personal information?

In order to confirm your identity, and the appropriateness of our products to your circumstances, we collect personal information from you. During the process of opening an account for you, we will request your name, address, date of birth, contact details, income and savings. We may ask for additional information such as, but not limited to, trading statements and employment details. This information will be collected through our account application form. We will also use our own records and information from other sources where applicable.

As this information helps us fulfill our regulatory requirements, if you choose not to provide some information it may mean that we cannot provide you with the service you have requested. To keep the information as up to date as possible, we will change any details, such as your address, promptly when you inform us that they have changed.

How do we use this information?

The primary purpose for obtaining this information is establishing and managing an account for you. We will be able to keep you updated whilst you are a client in relation to matters such as your trading account and what's happening at Finance Managers Co. Limited, including the services and products we offer. We may send you marketing information from time to time based on the information you have provided, whilst being conscious of the need to respect your privacy. You accept that whilst you have an account with Finance Managers Co. Limited, that we may also use your personal data for identification verification, Anti-Money Laundering (AML) and Countering terrorist financing purposes.

We will not sell your personal data, but you agree that it may be disclosed to:

- Other companies within the Finance Managers Group
- Any courts, regulatory or other official bodies as agreed or may be required by law
- Credit reporting or reference agencies

Due to CFTC regulatory restrictions and in accordance with the Dodd-Frank Act, FINANCE MANAGERS CO. LIMITED CANNOT OPEN ACCOUNTS FOR RETAIL CUSTOMERS WITH RESIDENCE IN THE UNITED STATES*.

*A United States resident means any of the following: any natural person resident of the United States; any company, partnership, or other legal entity created or organised under the laws of any jurisdiction of the United States; a branch or agency of a foreign entity located in the United States; a trust of which the trustee is a United States resident; an estate of which a United States resident is the executor or administrator; or any account held for the benefit of a United States resident.

- Other third party service providers who we may engage to provide research, identity verification checks or other services to Finance Managers Group
- Anyone authorised by you, or who may be authorised under the terms of our contract

PO Box 9023, Port Vila, Vanuatu by phone: +678-22-247,
by fax: +678-22-242 or by email: info@vfsc.vu

We will require any organisation to whom we disclose your information or who may obtain it on our behalf to ensure its confidentiality, and to handle it in accordance with relevant data protection acts. Please note neither of our Groups does not sell or provide your personal information to third parties for marketing purposes.

How will we manage and store your confidential information?

Your information will be held on our secure computer systems and paper files. We have advanced systems and procedures in place to prevent any unauthorised access, improper modification or disclosure, misuse or loss of information. Our employees are trained to handle personal information with confidentiality and respect. We regard any breaches of this policy very serious and will take appropriate action as necessary.

We may need to store your information for some time after you have given it to us, even if we no longer have a relationship with you. Once we consider that that information is no longer needed, we will remove any records that identify you or destroy it securely.

Additional Information

We do our best to ensure your information is kept up to date. We understand that such information changes frequently such as changes of address and other personal circumstances, and can normally update your personal information over the telephone or by email.

You may request a copy of the personal information we hold about you, and ask us to amend any inaccuracies. We may charge a fee to cover the cost of this verification. We will provide the information within 40 days of receipt of your request and any applicable fees.

Complaints

If you consider that we have breached our obligations under this policy, or have otherwise failed to respect your confidentiality, you can complain to us by calling +44 203 808 9388 or emailing customer@ubfx.co

If you are not satisfied with our response to any complaint, you should contact the Financial Ombudsman Service at Vanuatu Financial Services Commission, Rue Bougainville,