



## Privacy Policy

OraculoFX values your security and privacy. Protecting your privacy is one of our top priorities. This privacy policy sets out how we collect information regarding Website users, what we may do with it, and what you can do to protect your privacy.

We are using security measures and encryption systems, to make sure interaction with our website is smooth and safe. All transactions are performed under secured protocols, using the username and password chosen and guarded by you; the chances of someone else trading in your name are extremely low.

**Keeping your password safe:** You should make sure that you don't share the password with anyone and remember that OraculoFX personnel will never ask you for the password. If this happens and someone claims to be working for Trading-21, don't provide them with any information and make sure you notify our customer service at once. Pick a password that is hard to intercept and change it every couple of months. Also, remember to log out as soon as you stop trading with OraculoFX whenever you leave the computer and after every session.

The first step to start trading is to open an account and this process, simple as it is, requires you to enter some personal data such as country of residence, your first and last name, email and phone number. Additional details, as well as proof of identity, may be required of you at any time. OraculoFX will maintain the privacy of all your personal data we collect, including age, occupation or marital status. You may be required to provide the copies of ID, passport, and photograph, in accordance with any policies, laws or regulations that require such documents to be delivered. Furthermore, in some jurisdiction you may also need to submit financial information, investment experience, and risk tolerance, all as may be required by law.

In order to have unrestricted access to the trading account and be able to trade with ease, these documents and information may be required. There is no obligation on your part to submit them, but if you don't, you won't be able to open the account and trade online. Additionally, it is important to keep us informed about your personal data as soon as something important changes, so your profile will always be up to date, and as required under any law.

We collect this information to administer and operate services, prevent fraud, defend our legal rights and for the purpose of compliance with regulations regarding the services we provide. OraculoFX privacy policy guarantees that your personal information will not be sold, rented or traded, and won't be disclosed unless the following conditions occur or for the purposes set out above. We share information with the associated firms and other persons processing your personal information or with banks and clearing houses in order to deliver the products and services you need for trading.

When there is any suspicion of fraud or breach regarding the trading performed by the user, the privacy policy allows us to disclose your private data as needed, including to credit reference and fraud prevention agencies. The same applies for the national and international enforcement bodies and courts when they require this kind of information, as laws and regulations demand. Except for these situations, while you are trading with



Trading-21, your personal information is reasonably safe from unauthorized use, damage, modification or disclosure, by all reasonable measures.

## **Underage and Child Privacy**

By using this website, you state and represent that you are over the age of 18 or any age restriction applicable in your jurisdiction in order to participate in trading, as any laws applicable to you may dictate. If you are under age and entered the site by mistake, you should stop using the website and inform us promptly and we will conform with the applicable laws and regulations that apply to you and your personal information.

Regardless of the foregoing, in order to protect child privacy, we never knowingly collect or maintain information from users under 13, and no part of our website is structured to attract anyone under the age of 13. Should Website ever collect or maintain any such information, it will comply with the Children's Online Privacy Protection Act (COPPA) and any other applicable law, under the appropriate jurisdiction.

## **Changes to This Privacy Policy**

This privacy policy may be changed from time to time, as we see fit. The binding version is the most updated version posted on the site. We may, at our discretion, inform you via e-mail regarding any material changes.

Please note any and all usage of the site and services is subject to the Terms and Conditions, as may be amended from time to time by Trading-21, at its sole discretion.

## **Cybersecurity Notice**

The Cybersecurity Interpretive Notice, issued by the National Futures Association ("NFA") and approved by the Commodity Futures Trading Commission, becomes effective March 1, 2016. The Notice requires all Members of NFA (futures commission merchants, swap dealers, major swap participants, introducing Trading-21, forex dealer members, commodity pool operators and commodity trading advisors) to have in place practices that are reasonably designed to diligently supervise the risks of unauthorized access to or attack of their information technology systems, and to respond appropriately should unauthorized access or attack occur. Even though OraculoFX is not a member of the NFA, and do not accept US clients and clients in jurisdictions where their local laws do not allow working with international dealers in securities, OraculoFX shall do its best efforts to comply with such terms.