

Privacy Policy

Up Way Global Markets

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What this Policy is about

We recognise the importance of your privacy and understands your concerns about the security of your personal information. We are committed to ensuring that when you share information with us or we collect information about those who visit our websites, we do so in accordance with applicable privacy laws.

Protecting the privacy and safeguarding the personal and financial information of Up Way Global Markets LLC, trading as JRFX (hereinafter referred to as "JRFX") clients and website visitors is our obligation according to the Data Protection Regulation 679/2016/EU. The following Privacy Statement explains how we collect and protect your information.

Your Consent

By providing us with information about yourself through any of our websites, application forms, via telephone or otherwise, you consent to the collection, use, disclosure and transfer of that information as set out in this Privacy Policy. By using our websites you also consent to our use of cookies as set out in this Privacy Policy.

If you apply to open a trading account, your application form (whether written or electronic, or in any other form (including verbal) will constitute your express consent to the use and (in certain circumstances) disclosure of your personal information.

Your use of our online services or your provision of personal information to us constitutes your acceptance of the terms of this Privacy Policy.

Collection of Personal Information

We collect information required to open an account, to transact business effectively and to safeguard your assets and your privacy. To do this, we gather information to help us assess your needs and preferences. The information we collect directly from you includes information required to communicate with you, including your name, mailing address, telephone number, e-mail address. We also collect birth date and your location information. All information is collected in accordance with data protection and money laundering legislation.

Data to be collected

Via the corporate website www.jrfx.com, our IT infrastructure may collect the following log data related to individual visitors of our corporate website:

- IP address of website visitor
- Geographic location of website visitor
- Internet Access Service provider of website visitor
- Type of computer or telecommunication device used by website visitor

- Frequency and duration of sessions per page visit by website visitor
- Data and documents of website accessed by website visitor

Via the contact form on our corporate website, the following data may be collected:

- Name
- Surname

From individual clients

- Copy of Passport
- Copy of ID card
- Proof of physical address
- Information and documents related to the individual's profession and /or employment
- Criminal record

- Documents of the financial status (e.g. non-bankruptcy certificate)
- Documents regarding the educational background
- Documents related to the origin of wealth
- Contact telephone number(s)
- Electronic mail address

How information is collected

We obtain most of the information directly from you through application forms or telephone conversations, and from maintaining records of information obtained in the course of ongoing customer service. We may also obtain information from other sources, such as via identity checks.

We may also obtain information about you through your use of our websites, apps or through the use of cookies on our websites.

Sometimes we may ask for other information voluntarily (including through market research, surveys or special offers) so that we can improve our service or better cater to the wider needs of our current and future clients.

We may record communications that we have with you in relation to the services we provide to you and our relationship with you. These recordings may be in electronic format, by telephone, in person or otherwise and will be our sole property, constituting evidence of the communications between us. Such telephone conversations may be recorded without the use of a warning tone or other notice.

If you choose not to provide the information we request, we may not be able to provide you with the product or service you need or open your trading account.

How we use and disclose your information

We use the information you give us to assess your application, conduct identity checks, verify you and do anything else necessary in order to open your trading account. This includes conducting screening checks in accordance with our obligations under relevant anti money laundering laws and other regulatory laws.

Once this process is complete, the information we hold is used for establishing and managing your account, reviewing your ongoing needs, enhancing our customer service and products and giving you information on any opportunities that we believe may be relevant to you.

We may also use your personal information for the future planning of our business, including product development and research. In such instances (and in instances where we have legal or regulatory obligations),

and depending upon particular restrictions on sensitive information, you consent to the disclosure of your personal information where we disclose that information to:

1. relevant regulators or government authority as required, authorised, permitted or compelled by law;
2. other companies within the JAFX/Up Way Group (including our associated companies elsewhere in the world) who may be involved in administering your account or providing other services for the JAFX/Up Way Group;
3. where applicable, anyone authorised by you (for example, your financial adviser);
4. an introducing broker, referrer, or third-party broker or agent who may have introduced or referred you to us (this is necessary in order to pay fees or commissions for such a referral and can include any click-through links you may have clicked on); and
5. third party service providers, including those who help facilitate or support our business, or develop new software to run our business more efficiently (these could include specialist advisers who have been contracted to provide us with administrative, IT, financial, regulatory, compliance, taxation, insurance, research or other services).

Where we share your personal information in the ways set out above, you acknowledge and understand that this may result in your personal information being sent outside Saint Vincent and the Grenadines. Where this occurs, while we make reasonable attempts to, you acknowledge that we may not be able to extract an undertaking from the overseas recipients that they will comply with privacy laws and the ability to enforce privacy laws or any other contractual privacy obligation in relation to any breach may be very limited. As such, we will not be accountable for any breaches of those laws by that overseas recipient.

Because privacy laws may not apply or be enforceable against some overseas recipients, we understand that you may choose not to disclose your personal information to us. If you choose not to provide the information however, we may not be able to open your trading account, or provide you with the product or service you have requested.

Maintenance of Records

Record-keeping procedures are in accordance with the applicable regulation. All company's records are maintained for at least five years or for a longer period where requested by the Regulator. The retention of data collected at JAFX is carried out by using secured physical and electronic storage facilities free from any access by unauthorized persons.

Direct Marketing

We may use your personal information to offer you products and services that we believe may interest you. We will not do this if you tell us not to. We will not provide your information to non-Group entities for marketing purposes.

If you do not wish to receive marketing offers from us, you can let us know by emailing us at support@jafx.com.

Our Affiliates and Partners

We may share information with affiliates if the information is required to provide the product or service you have requested or to provide you the opportunity to participate in the products or services our affiliates offer. We may also forge partnerships and alliances, which may include joint marketing agreements, with other companies who offer high-quality products and services that might be of value to our clients. In order to ensure that these products and services meet your needs and are delivered in a manner that is useful and relevant, we may share some information with partners, affiliates and alliances. This allows them to better understand the offers that are most relevant and useful. The use of your personal information is limited to the purposes identified in our relationship with the partner or affiliate. However, at JRFX, all disclosures of personal data to third parties strictly require the informed consent of the individual data subject, to which the data relates, prior to the disclosure. According to the Data Protection Regulation 679/2016/EU, only such disclosures are exempt from the aforementioned rule as they are made to a governmental body.

Non-Affiliated Third Parties

We do not sell, license, lease or otherwise disclose your personal information to any third party for any reason, except as described below. We reserve the right to disclose your personal information to third parties where required by law to regulatory law enforcement or other government authorities parties with which we share personal information are required to protect personal information in a manner similar to the way we protect personal information.

Restriction of Responsibility

If at any time you choose to purchase a product or service offered by another company, any personal information you share with that company will no longer be controlled under our Privacy Statement. We are not responsible for the privacy policies or the content of sites we link to and have no control of the use or protection of information provided by you or collected by those sites. Whenever you elect to link to a co-branded Web site or to a linked Web site, you may be asked to provide registration or other information. Please note that the information you are providing is going to a third party and you should familiarize yourself with the privacy policy provided by that third party.

Opting Out of Disclosures of Non-Public Personal Information

You may direct us not to disclose non-public personal information to certain non-affiliated third parties. To opt out of sharing non-public personal information with non-affiliated third parties, please contact our Customer Support representatives at support@jrfx.com. An opt out election made by one account owner of a joint account is applicable to all account owners of the joint account. An opt-out election must be made for each separate account you hold with us.

Use of Cookies

A cookie is a small text file stored on the user's computer for record keeping and security purposes. It

allows us to enhance user experience while browsing our website. JRFX issues cookies upon landing on our website, unless the cookie settings on user's browsers are disabled. Please be notified that by turning off cookie tracking in your browser, some of our services might become unusable such as promotions or registration. Cookies used by us do not contain any personal information nor do they contain account or password information. They merely allow the site to recognize that a page request comes from someone who has already logged on. To administer and improve our web site, we may use a third party to track and analyze usage and statistical volume information, including page requests, form requests, and click paths. The third party may use cookies to track behavior and may set cookies on behalf of us. These cookies do not contain any personally identifiable information, but not limited to, developing and marketing products. We are entitled, but not obligated, to review or retain your Communications. We may monitor your Communications to evaluate the quality of service you receive, your compliance with this Agreement, the security of the Web site, or for other reasons. You agree that such monitoring activities will not entitle you to any cause of action or other right with respect to the manner in which we monitor your Communications. In no event we will be liable for any costs, damages, expenses or any other liabilities incurred by you as a result of our monitoring activities.

Changes to This Privacy Statement

From time to time, we may update this Privacy Statement. In the event we materially change this Privacy Statement, the revised Privacy Statement will promptly be posted to the websites and we will post a notice on our websites informing you of such changes. You agree to accept posting of a revised Privacy Statement electronically on the website as actual notice to you. Any dispute over our Privacy Statement is subject to this notice and our Customer Agreement. We encourage you to periodically check back and review this policy so that you always will know what information we collect, how we use it, and to whom we disclose it. If you have any questions that this statement does not address, please contact us at support@jrfx.com.