

Privacy Policy

Privacy Policy Statement

The protection of privacy and the safeguarding of our Clients' personal and financial information is our highest priority. Please view the following Privacy Policy Statement which clearly explains how we, at Triple A Experts Investment Services S.A. ("AAAFx"), collect, process, store and protect our Clients' information. By opening an account, Client hereby gives AAAFx its consent to such collection, processing, storage and use of personal information by AAAFx as explained below.

Collection of personal information

AAAFx collects the necessary information required to open your account, carry out transactions on your behalf and safeguard your assets and your privacy and to provide you with the services you require. To this end, AAAFx gathers information from you and may, in certain circumstances, gather information from relevant banks and/or credit agencies, and/or other sources which help us profile your requirements and preferences and provide better services to you.

The information AAAFx collects may include:

1. Personal information you provide us in your application form, such as your name, address, date of birth, email address, income and income source etc. in order to facilitate the evaluation of your application. The information you provide us is also used for the purposes of communicating with you.
2. Transaction information about the anticipated volume and value of your transactions with us and income information provided in order to enable the construction of your economic profile.
3. Verification information necessary to verify your identity, such as an identification card, passport or driver's license. This also includes background information we receive about you from public records or from other entities not affiliated with AAAFx.

Usage of personal information/OPT OUT / notification of changes

AAAFx uses personal information only as required to provide quality services and security to you. This information helps improve services, customize browsing experience and enables us to inform you of additional products, services or promotions relevant to you and the products and services you require and you consent to us using this data for such purposes. If you do not want to receive information of this nature for any reason, please contact us at the following address: info@aaafx.com. Although you are not required to provide AAAFx any of the personal information that we may request please note that failure to do so could result in AAAFx not being able to open your account or provide you with the service you require.

Whilst we attempt to ensure that all the information we hold about you is current, accurate and complete, we urge you to immediately contact us if any of your personal details have changed.

Protection of personal information

Any personal information you provide us will be treated as confidential and shared only within AAAFx and its affiliates and will not be disclosed to any third party except under any regulatory or legal proceedings. The personal information that you provide in connection with registering yourself as a user of our website is protected in many ways. You can access your Registration Information through a password selected by you. This password is encrypted and known only to you and shall not be revealed to anyone else. Registration Information is safely stored on secure servers that only authorized personnel have access to via password. AAAFx encrypts all personal information as it is transferred to AAAFx and thus makes all necessary effort to prevent unauthorized parties from viewing any such information.

Affiliates and partners

AAAFx may share information with partners, affiliates and alliances in the event such information is reasonably required by such affiliate in order to:

1. Offer additional similar products and services that meet your needs and which are delivered in a manner that is useful and relevant (only where you have authorized us to do so);
and/or
2. Servicing customer accounts.

Non-affiliated third parties

AAAFx does not sell, license, lease or otherwise disclose personal information to third parties, except as described in this Privacy Statement. AAAFx reserves the right to disclose information as necessary to credit reporting or collection agencies as reasonably required in order to provide the services to you. To help us improve our services, AAAFx may engage third parties to help carry out certain internal functions such as account processing, fulfillment, client service, client satisfaction surveys or other data collection activities relevant to our business. Use of the shared information may also be used to provide professional, legal, or accounting advice to AAAFx. Use of shared information is strictly limited to the performance of the above and is not permitted for any other purpose. All third parties with which AAAFx shares personal information are required to protect such personal information in accordance with all relevant legislation and in a manner similar to the way AAAFx protects the same. AAAFx will not share personal information with third parties which it considers will not afford its Clients the required level of protection. Where you have been introduced to us by a Business Introducer, such Business Introducer may have access to your information. You hereby unambiguously and unequivocally consent to the sharing of information with such Business Introducer. You acknowledge that in order to provide services to you, it may be necessary for information to be transferred outside of the European Economic Area and you consent to such transfer.

Regulatory disclosure

AAAFx reserves the right to disclose personal information to third parties where required by law, regulatory, law enforcement or other government authority of a competent jurisdiction in order to protect our rights and/or to comply with such legal proceedings. Such disclosure shall occur on a 'need-to-know' basis, unless otherwise instructed by a regulatory or other government authority. Under such circumstances, AAAFx shall expressly inform the third party regarding the confidential nature of the information.

Without limiting the foregoing, AAAFx, in its capacity as a regulated Greek Investment Firm, is required to comply with the following pieces of legislation, requiring the disclosure of information related to the accounts held with us:

1. On the basis of Article 16 of the European Parliament and Council Regulation 596/2014, AAAFx - like all professional financial intermediaries such as banks and investment firms - has an obligation to process and send personal data to the HCMC, including when there are serious grounds for suspecting that specific transactions could constitute insider trading or market manipulation within the meaning of Regulation (EU) 596/2014, and as regards the relevant data and information the confidentiality obligation will not apply.
2. Customer's personal data may be transmitted to the HCMC and other supervisory authorities, competent public authorities and public authorities, including the competent Tax Offices, to trading venues, central registers or clearing institutions, to banks indicated by the Client, as well as to entities affiliated or related with AAAFx, in order for AAAFx perform its obligations from our business relationship.
3. In the context of the application of Article 9 of Law 4170/2013 on the automatic exchange of tax information between the Greek tax authorities and the competent authorities of the other Member States of the European Union, Law 4428/2016 on the ratification of the Multilateral Agreement of Competent Authorities for the Automatic Exchange of Financial Account Information concerning Greece and OECD participating States, as well as Law 4493/2017 on the Ratification of the Memorandum of Understanding and the Agreement between the Governments of the Hellenic Republic and the USA regarding the application of the US Foreign Accounts Tax Compliance Act (FATCA), AAAFx is obliged to collect from the Customer data for the determination

of his / her tax domicile and, if the Customer is subject to the relevant provisions, to disclose information to the competent Greek Tax authority, regarding the content of the accounts kept in the name of the client.

4. In accordance with article 2 par. 5 of Resolution 1/808/7.2.2018 of the HCMC, AAAFx has the obligation - for the purpose of protecting clients' assets – to provide information on the financial instruments and readily available funds of its clients to competent authorities, appointed insolvency practitioners and those responsible for the reorganization of insolvent institutions, including internal accounts and records that identify the balances of funds and financial instruments held for each client.
5. AAAFx may send information about the client's identity and the cash amounts held on his / her behalf to Greek credit Institutions in order to safeguard his / her interests Customer under the Greek deposits guarantee fund legislation (see relevant information in the "Client Asset Protection" document).

Restriction of responsibility

AAAFx is not responsible for the privacy policies or the content of websites www.aaafx.com links to and has no control of the use or protection of information provided by Client or collected by those sites. Whenever Client elects to link to a co-branded website or to a linked website, Client may be asked to provide registration or other information. Please note that such information is recorded by a third party and will be governed by the privacy policy of that third party.

AAAFx shall not be liable for any loss suffered by you as a result of the disclosure to third parties in accordance with our privacy policy or errors in the content of your personal information, unless such errors are caused by willful misconduct or gross negligence of executives, agents or employees of AAAFx.

Use of "cookies"

AAAFx uses cookies to secure your trading activities and to enhance the performance of the www.aaafx.com website. Cookies used by AAAFx do not contain personal information or other sensitive information. AAAFx may share website usage statistics with reputable advertising companies and with its affiliated marketing companies. The information collected by the advertising company is not personally identifiable. To administer and improve the www.aaafx.com website, AAAFx may use third parties to track and analyze usage and statistical volume information. The third party may use cookies to track behavior and may set cookies on AAAFx 's behalf. These cookies do not contain any personally identifiable information.

Privacy statement updates

We may change or update portions of this Privacy Statement to reflect changes in our practices and or applicable law and regulation. Please check this Privacy Statement from time to time so you are aware of any changes or updates to the Privacy Statement. In the event AAAFx materially changes this Privacy Policy Statement including how we collect, process or use your personal information, the revised Privacy Policy Statement will be posted on the website Client agrees to accept posting of a revised Privacy Policy Statement electronically on the website as actual notice to Client. Any dispute over our Privacy Policy Statement is subject to this notice and our Customer Agreement. AAAFx encourages Client to periodically check back and review this policy so that Client always will know what information AAAFx collects, how AAAFx uses it, and to whom AAAFx may disclose it.

Agreement

Entering into an agreement with us for the provision of investment services and accepting our terms of business shall mean that you have read and understood and that you agree with the terms of this Privacy Policy Statement, as well as that you confirm that you have full power and authority to be bound by the terms of this Privacy Policy Statement.

Further, you hereby provide us with your express consent for storing and processing your personal information for the fulfillment of our obligations under our business relationship. You confirm being aware that you have a right of access, in accordance with the procedures prescribed by law, to

information related to you and stored and processed by us, including a right of information on the content of the data, the manner, purpose and time of processing, the categories of recipients and any changes to the above information, unless otherwise provided by the applicable legislation. You also confirm being aware and accepting that we may disclose personal data to public authorities and third parties as mentioned above in this statement.

For any other relevant concern please visit our website www.aaafx.com.