

PRIVACY POLICY

Holiway Global Ltd (hereinafter the “Company” or “us” or “we”, or “our”) operates <https://miltonprime.com> (the “Site”). This page informs you of our policies regarding the collection, use and disclosure of Personal Information we receive from users of the Site.

We use your Personal Information only for providing and improving the Site. By using the Site, you agree to the collection and use of information in accordance with this policy.

1. Information Collection and Use

While using our Site, we may ask you to provide us with certain personally identifiable information that can be used to contact or identify you. Personal identifiable information may include, but is not limited to your name (“Personal Information”).

The Company will be the controller of your personal data provided to, or collected by or for, or processes in connection with our services and regulated activities.

The provision of “Your Data” is required from you to enable us to provide our services. We will inform you at the point of collecting information from you, whether you are required to provide the information to us.

In the course of your registration as a client, signing up for a demo or a live account with MiltonPrime or filling in any form on our Website, subscribing to our services, news or offers, marketing communications or posting material, the following information about you (“Your Data”) will be collected and stored for administrative, service related and/or legal purposes.

We will limit the collection of personal information to what is necessary to administer our business and carry out our regulated activities in an effort to provide you with superior service, Information that you provide to us directly:

- Personal information, such as names, addresses, personal registration number, national identification number, passport number and email addresses etc (“Personal Information”), and
- Financial Information, trading experience and employment information for appropriateness assessment will also be collected.

However, the meaning of data “provided to” MiltonPrime is not limited to this. It is also personal data resulting from observation of your activities (i.e where using a device or service). This may include:

- History of website usage or search activities, details of your visits to our Website including, communication data;
- Traffic and location data;
- Website traffic pattern information, including IP address, operating system and browser type, for system administration and to report aggregate information to our

advertisers. This kind of information is only used in masked or aggregated form, which means that the individual user will not be recognisable. These data do not identify any individual.

- Communications between you and MiltonPrime via Live Chat, email, or telephone call.

Your e-mail address may be used by MiltonPrime in relation to its products and services (including any marketing campaigns related to these products or services). If you do not wish to receive such marketing material and marketing communications, you can opt-out at any time by clicking on “unsubscribe” or by sending us an email stating so.

Specifically, please refer to the below table for the type of data collected and the purpose of the relevant collection:

1. Personal Information including Full Name, date of birth, address, citizenship, ID or passport number, social security number - To meet our anti money laundering (AML) and other regulatory obligations in relation to Know Your Client (KYC) and client due diligence. To verify your identity using our verification processes.
2. Contact Information including phone number and email address - In order to send you correspondence in relation to the services provided and to fulfil our regulatory and compliance obligations.
3. Financial sanctions and credit header information - In order to perform our electronic AML screening checks and to comply with other fraud detection policies. This may generate further information on your credit history, criminal convictions or political interests leading to us making decisions based on the results of these checks.
4. IP address - When you visit our website, navigate through the pages or fill in any forms, we may collect your unique device number or IP address in order to set up your profile.
5. Proof of identification & proof of address - In order to comply with KYC and regulatory trade reporting and other AML obligations.

2. Log Data

Like many site operators, we collect information that your browser sends whenever you visit our Site (“Log Data”). This Log Data may include information such as your computer’s Internet Protocol (“IP”) address, browser type, browser version, the pages of our Site that you visit, the time and date of your visit, the time spent on those pages and other statistics. In addition, we may use third party services such as Google Analytics that collect, monitor and analyze.

3. Communications

We may use your Personal Information to contact you with newsletters, marketing or promotional materials and other information.

4. Cookies

Cookies are files with small amount of data, which may include an anonymous unique identifier. Cookies are sent to your browser from a web site and stored on your computer's hard drive.

Like many sites, we use "cookies" to collect information. You can instruct your browser to refuse all cookies or to indicate when a cookie is being sent. However, if you do not accept cookies, you may not be able to use some portions of our Site.

5. Security

The security of your Personal Information is important to us, but remember that no method of transmission over the Internet, or method of electronic storage, is 100% secure. While we strive to use commercially acceptable means to protect your Personal Information, we cannot guarantee its absolute security.

6. Period that your personal information will be kept – Data Retention

You can close your account any time, but for audit trail purposes, MiltonPrime shall hold personal data for a period of at least five years after closing the account in order for us to comply with our record keeping obligations under the Money Laundering Regulations 2017.

At the end of that period, we will delete all personal data relating to you, unless a legal requirement requires them to keep the data for a prolonged period of time, or Data Subject has expressly consented to their data being held for an extended period of time.

7. Changes to this Privacy Policy

This Privacy Policy is effective as of April 10, 2020 and will remain in effect except with respect to any changes in its provisions in the future, which will be in effect immediately after being posted on this page.

We reserve the right to update or change our Privacy Policy at any time and you should check this Privacy Policy periodically. Your continued use of the Service after we post any modifications to the Privacy Policy on this page will constitute your acknowledgment of the modifications and your consent to abide and be bound by the modified Privacy Policy.

If we make any material changes to this Privacy Policy, we will notify you either through the email address you have provided us, or by placing a prominent notice on our website.

8. Contact Us

If you have any questions about this Privacy Policy, please contact us.