

# Atlas Risk Advisory, trading as AtlasFX, located in San Francisco, United States and Dublin, Ireland.

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### **Privacy Policy**

Atlas Risk Advisory (AtlasFX) is committed to building user trust and confidence by promoting and complying with the use of business practices that help protect the privacy of our customers' and users' data. Atlas Risk Advisory demonstrates its commitment to your privacy by agreeing to disclose its information, practices, and policies in compliance with the Data Commissioner of Ireland, the Personal Data Security Breach Code of Practice and the EU-US Privacy Shield principals defined by the U.S. Department of Commerce with cooperation with the European Commission. Atlas Risk Advisory has set out to meet requirements mandated by the Data Commissioner's defined policies. For more information please visit <a href="https://www.dataprotection.ie">www.dataprotection.ie</a>.

For the purpose of the Data Protection Acts 1988 and 2003 (as amended) (Acts), for any acts relating to the visitation of atlasfx.com, the data controller is Atlas Risk Advisory, with registered number 494529 and registered office address: S29, The Pottery, Pottery Road, Dun Laoghaire, Co. Dublin, A96 FV50

#### Information Collection & Use

Visitors to the atlasfx.com may request more information from AtlasFX by filling out one or more online forms. Forms on the site include: contact us form, a request a demo form and a get support form. The same information is requested regardless of which form is filled out. The information collected through these forms is used solely to contact the visitor to resolve any questions and/or comments that they might have. We may use the contact details for any future marketing campaigns and this is clearly stated on the form itself. We also have an opt-out option on all marketing emails. We don't share this information with any individuals outside of AtlasFX and the data is retained in line with the data protection policy within a secure environment. Information requested on the online form is listed below

First name

Last Name

Company Name Email address

Contact phone number

We may also ask you for information if you report a problem with our Site and or services. If you contact us, we may keep a record of that correspondence. If you provide us with personal information relating to any third party, you confirm that you have received that third party's consent in relation to such disclosure and that the third party has been informed of and agrees to the terms of this Privacy Statement and the purposes for which Atlas may process and use that person's personal information.

#### IP Addresses and Cookies

When you access our Site, your computer's browser provides us with information such as your IP address, browser type, access time and referring URL, which is collected and used to compile site metrics and traffic flows. This information may be used to help us to improve our Site and the Services that Atlas offers.

Our Site uses cookies. A cookie is a small text file that is generated by our Site, sent to a user's browser and stored on the hard drive of the user's computer. The purpose of cookies is to store information relating to users of our Site. Cookies on atlas sites store user information including IP addresses, navigational data and user preferences. Our Site uses session cookies that are stored temporarily on a user's computer and are not retained when the user ends the session. Some browsers do not support cookies and other browsers provide a way to turn off cookie functionality by changing the settings on the browser. Turning off cookie functionality on your browser may affect your ability to access or use certain parts of our Site.

Atlas use Google Analytics and Crazy Egg added to our pages in order to assist us in redeveloping our websites. Google Analytics and Crazy Egg allow us to measure and learn in aggregate how our website is consumed; for example, which are the most popular pages? This functionality helps us ensure we provide relevant information in an easily accessible format.

#### Notice and Choice

End users using Atlas Risk Advisory products must provide a first name, last name, and email address to receive login credentials to access Atlas Risk Advisory product. This information is kept confidential and is only used to help identify and access Atlas Risk Advisory product functionality.

#### Legal Disclaimer

We reserve the right to disclose personal information as required by law and when we believe that disclosure is necessary to protect rights of he company, its officers or agents.and/or comply with a judicial proceeding, court order, or legal process served on our Web site.

# Terms

No party other than Atlas Risk Advisory and participating customers can access information stored on our servers. Atlas Risk Advisory has taken caution by placing security measures and firewalls on all network servers in an attempt to prevent outside parties from accessing confidential information. In the event of a breach of security or attempted breach of security, Atlas Risk Advisory will press charges to the fullest extent against those parties illegally accessing information on our servers, both civilly and criminally.

# Access and Data Integrity

## Your Account Access

Usernames and passwords are stored in our databases. All passwords are encrypted. Account information is kept secure and used solely by you to access your client account and to facilitate communication. User information is stored only when a user voluntarily gives this information for use by a client company. No information is released outside of the Atlas Risk Advisory system.

## Enforcement

To ensure compliance, you are encouraged to contact our IT security officer with a query or complaint by sending an email to <a href="mailto:support@atlasfx.com">support@atlasfx.com</a>. If

you do not receive acknowledgement of your inquiry or your inquiry has not been addressed to your satisfaction, you may escalate your feedback to the Data Protection Commissioners or an EU-US Privacy Shield representative.

Atlas Risk Advisory appreciates your confidence in us as a web portal. In an attempt to ensure your confidentiality and privacy, we have developed controls to keep your information from outside parties. Security encryption of your information using the latest in technology is used to help keep your information anonymous and confidential. This privacy policy covers all information collected on atlasfx.com, including information collected on Atlas Risk Advisory products.

If you have questions, concerns, or complaints, please contact an Atlas Risk Advisory Privacy Compliance officer: Email: support@atlasfx.com