

Privacy Policy

Hotspot FXR ("Hotspot FX") has created this privacy policy in order to demonstrate our firm commitment to privacy. Due to the sensitive nature of the information we collect from our users, we believe it is important to satisfy strict privacy requirements. The following policy covers treatment of all personally identifiable information collected by Hotspot FX. The policy does not apply to the practice of other companies and websites that Hotspot FX does not control. In addition, this site contains links to other sites. Hotspot FX is not responsible for any of the content, advertising, products, policies or other materials on such external sites, including without limitation, their privacy practices and policies.

Information Collection and Use: Registration

In October 2001, the President of the United States signed into law the Patriot Act. The Patriot Act provides the United States Government with additional tools to fight the funding of terrorism and money laundering activities. As a result, financial institutions like Hotspot FX are required to adopt and enforce anti-money laundering policies and procedures that include a customer identification program. As part of Hotspot FX's anti-money laundering policies and procedures, Hotspot FX requires ALL customers to provide certain documents that will assist the Company in verifying their true identity. Therefore, at a minimum, during registration a user is required to give their contact and other information. Hotspot FX will collect specific information: Client names, primary addresses and account addresses, telephone numbers, e-mail addresses, fax numbers, social security numbers, copies of driver's licenses, current government issued passports, age, date of birth, marital status, number of dependents; employer's name, address, phone number and type of business, number of years at current employer, current position held at said employer; financial information relating to annual income and approximate net worth, bankruptcies and risk capital; previous trading experience including the type, name(s) and addresses of trading firms, and the time frame that the trading experience took place; bank references including bank name, address, phone number, account numbers, approximate account balance, and contact person from said institution; investment objectives, and in some cases, a current utility bill. If Hotspot is unable to obtain reasonable verification through the documents provided or through third party background checks, Hotspot FX reserves the right to request additional documentation and possibly deny your account.

This information is collected to determine if a client meets the criteria set forth by Hotspot FX to be approved for a trading and/or demo account. For example, Hotspot FX does not provide services to children. If a user is under 18, he or she may not have an account with Hotspot FX. The information is also used to contact the client regarding specifics to their account status and to advise clients about services on our site for which they have expressed interest. The information is collected from the Hotspot FX account application form, demo form and "contact us form". Hotspot FX Inc. is the sole owner of the information collected on this site. We will not sell, share, or rent this information to others in ways different from what is disclosed in this statement.

We use personally identifiable information to help us compile general statistical data, keep in contact with users and provide a better interactive experience. We use personally identifiable information specifically for the following purposes:

- To provide a user with easy access every time the user reenters this web site without requiring reentry of enrollment information. We accomplish this by obtaining that information directly from users and passively through the use of encrypted session ID's and passwords.
- To help provide information and services that are most relevant to the users' needs based on the personally identifiable information provided. This is not a form of directed advertising. Rather, the personally identifiable information helps shape the content the user sees.
- To provide education and support through communication with Hotspot FX. This includes Hotspot FX using personally identifiable information to respond to user questions.

Communication

Clients can expect to be contacted by Hotspot FX on the telephone and through electronic mail. Hotspot FX will use these channels of communication to discuss information specific to their account. We also send site and service announcement updates to users. We communicate with users to provide requested services regarding issues relating to their accounts.

Cookies

A cookie is a piece of data stored on the user's hard drive containing information about the user. Usage of a cookie is in no way linked to any personally identifiable information while on our site. Once the user closes their browser, the cookie simply terminates. If a user rejects the cookie, they may still use our site. The user will not be limited to any site functionality if they reject site cookies. Cookies can also enable the site to track and target the interests of our users to enhance the trading experience on our site.

Log Files

The website automatically logs information such as IP addresses, ISP's, and browser type. The information will not be linked to the client's personal information. We use IP addresses to analyze trends, administer the site and track user's movements within the site. All information is stored on our own server, and IP addresses and IP reports will not be shared with advertisers.

Aggregate Data

We treat all personally identifiable information that we receive from users as confidential. By using this web site, each user agrees to allow personally identifiable information provided to us to be collected and combined with personally identifiable information we get from other users, on an aggregate, anonymous basis. We reserve the right to use all personally identifiable information to produce non-personal, aggregate statistical information ("Aggregate Data"). We reserve the right to use, maintain, update and sell Aggregate Data. We use Aggregate Data to, among other things, assess general usage trends and other patterns of use of this web site. If you have questions about how we aggregate the data or how we use Aggregate Data, please contact our Privacy Officer via electronic mail: privacyofficer@Hotspotfx.com.

Sharing of Data and Information

We may or may not provide Aggregate Data to third parties, but we will not provide them with a user's personally identifiable information (1) without permission to do so, or (2) unless we believe in good faith that we must do so to comply with legal requirements such as laws, regulations, search warrants, subpoenas or court orders. However, in the event that Hotspot FX sells assets or the stock of Hotspot FX to a third party or enters into a business combination (e.g., a merger, joint venture, or consolidation) with a third party, since client information is generally one of the business assets transferred in such a transaction, clients' personally identifiable information would likely be one of the transferred assets, and Hotspot FX reserves its right to transfer data in connection with those types of transaction, without specific notice to its users.

Surveys & Contests

From time-to-time our site requests information from users via surveys or contests. Participation in these surveys or contests is completely voluntary, and the user therefore has a choice whether or not to disclose this information. Information requested may include contact information (such as name and mailing address) and demographic information (such as zip code). Contact information will be used to notify the winners and award prizes. Survey information will be used for purposes of monitoring or improving the use and satisfaction of this site.

Security

This website takes every precaution to protect our users' information. When users submit sensitive information via the website, that information is protected both online and off-line.

When our registration/order form asks users to enter sensitive information (such as bank account number and/or social security number), that information is encrypted and protected to control loss, misuse and alteration. Hotspot FX uses SSL to provide a high level of data security, in accordance with the technology available today. While on a secure page, such as our order form, the lock icon on the bottom of Web browsers such as Netscape Navigator and Microsoft Internet Explorer becomes locked, as opposed to un-locked, or open, when you are just 'surfing'. To learn more about SSL, follow this link: <http://directory.netscape.com/Computers/Internet/Protocols/SSL-TLS>.

While we use SSL encryption to protect sensitive information online, we also protect user information off-line. All of our users' information, not just the sensitive information mentioned above, is restricted in our offices. Only employees who need the information to perform a specific job (for example, our billing clerk or a customer service representative) are granted access to personally identifiable information. Our employees must use password-protected screen-savers when they leave their desks. When they return, they must re-enter their password to re-gain access to client information. Furthermore, ALL employees are kept up-to-date on our security and privacy practices. Every quarter, as well as any time new policies are added, our employees are notified and/or reminded about the importance we place on privacy, and on which we store personally identifiable information are kept in a secure environment, behind a locked cage.

If you have any questions about the security at our website, you can send an email to privacyofficer@Hotspotfx.com

Special Offers

We send all new members a welcoming email to verify password and username. Established members will occasionally receive information on services and special deals. Users have the option to not receive these types of communications. Users can respond to these emails according to instructions in order to opt-out of further communications.

Site and Service Updates

We also send site and service announcement updates to users. Members are not able to un-subscribe from service announcements, which contain important information about the service. We communicate with the user to provide requested services and in regard to issues relating to their account via email or phone.

Correction/Updating Personal Information:

If a user's personally identifiable information changes, or if a user no longer desires our service, we will endeavor to provide a way to correct, update or remove that user's personal data provided to us. This can usually be done at the member information page or by emailing our Customer Support. Users may choose to contact Hotspot FX via telephone.

Notification of Changes

We may change the terms and conditions of this Privacy Policy at any time by posting revisions on this web site, and use of the information that we gather is subject to the Privacy Policy in effect at the time of use. We will not specifically notify users of changes, but we will post the date on which it was last revised. It is the user's responsibility to check to see if this Privacy Policy has changed, and you should check this Privacy Policy often to see recent changes. Continued use of this web site after any changes have been posted indicates agreement to the revised terms of the Privacy Policy.