





# Privacy Policy

December 2022 - ConnexT LLC (hereafter referred to as "ConnexT", "Company", or "we") is a registered company in Saint Vincent and the Grenadines with the company number 2652 LLC 2022, and its registered office is at Richmond Hill Road, P.O. Box 2897, Kingstown, Saint Vincent, and the Grenadines. Following the International Business Companies (Amendment and Consolidation) Act, Chapter 149 of Saint Vincent, and the Grenadines Revised Laws of 2009 (hereafter referred to as "Law"), the Company is authorised as an international business company. The Company is committed to protecting your privacy and offering you a robust online experience by safeguarding your personal and financial data (hereafter referred to as "personal data").

By registering with or accessing the ConnexT website, mobile and web applications, and trading platforms, you consent to collecting and using the personal data we require from you. This Privacy Policy applies to the ConnexT website and governs personal data collection and usage. By registering an Account with ConnexT LLC, you agree to have your personal data processed and expressly consent to the collection, systematization, aggregation, storage, revision (updating, changing), usage, anonymization, blocking, deletion, and distribution (transfer) of said personal data to third parties following the conditions outlined in this Privacy Policy (hereafter referred to as "Privacy Policy", "Privacy Policy Statement", "Statement" or "Policy").

You agree to the personal data practices outlined in this privacy policy by using the ConnexT website. You agree to the Company's collection and use of your information if you use the Company's website or provide it to us in other ways. You also guarantee to provide truthful, accurate, and current information. Users and/or clients and prospective users and/or clients are urged to thoroughly read the Terms of Service and Conditions before entering a contractual relationship with the Company.

Additionally, users and/or clients and prospective users and/or clients are urged to thoroughly read our detailed Privacy Policy Statement on our website, which should always be read in



conjunction with the Terms of Service and Conditions and form an integral and indivisible part thereof. This Policy is a fundamental component of the Terms of Service and Conditions and an integral part of them, and in the case of a conflict between them, the Terms of Service and Conditions will take precedence, leaving the other conditions intact.

The English version of this Privacy Policy statement, Platforms and the Terms of Service and Conditions is the official, authoritative version. Translations that may be provided are for your convenience only and should always be cross-referenced with the English text, which is the only version of the text intended to have legal effect.

"Client(s) or Customer (s)" means any natural or legal person:

1. who seeks to enter a business relationship or conduct an individual transaction with the Company or
2. To whom an investment firm provides any investment or ancillary services

## Introduction

1. This privacy statement covers the website [www.connextfx.com](http://www.connextfx.com) and all its related sub-domains, trading related Platforms and mobile applications owned, registered and/or operated by the Company.
2. The Law does not prohibit any of the Company's objectives and/or activities. This statement includes, but is not limited to, all financial, commercial, trading, lending, borrowing, service activities, and participation in other businesses and/or enterprises, as well as the provision of brokerage, managed account services, and trading.
3. The Company does not aim to display its website and services to persons in countries where the use of the website and its services is contrary to their national regulatory framework. When a user accesses this website from a country with or without prohibited access to this website, it is the user's responsibility to use the website or services under his/her local laws or regulations. The Company does not guarantee or claim that this website's information is suitable for all legal jurisdictions.
4. The Company describes in the privacy policy the procedures it follows while collecting, storing, using, and disclosing the Client's personal data. This Policy applies to Connext LLC, which must abide by its fundamental principles.
5. This Policy applies to existing clients, potential clients, website visitors and clients whose contractual relationship with the Company has been terminated by either the Company or the



Client or both (from now on, jointly referred to as "Clients" or "you" or "your") and who are using and/or otherwise accessing the Company's website(s), mobile and web applications and trading platforms (from now on referred to as the "Platforms").

6. If you disagree with any of the terms stated in this Policy, you are not permitted to use the Platforms.

7. The Company is dedicated to safeguarding the confidentiality of all Clients' Personal Data, which it handles under the terms of this Policy and the Company's Terms of Service and Conditions (hereafter referred to as "Terms of Service" or "Terms of Business")

8. Under this Policy, the term "personal data" refers to any information the Company can use to identify or potentially identify a client. This information might include but is not limited to, a client's name, address, identification number, phone number, date of birth, and other financial data.

## Collection of Personal Data

1. The Company collects several types of Personal Data via the Company's Platforms from Clients who visit the Platforms or access, use, manage or request products and services offered by the Company.

2. Certain Personal Data is required to establish and/or maintain and/or enhance a contractual relationship of the client with the Company. Clients not willing to provide such Personal Data to the Company will not be able to initiate and/or finalise the account opening procedure with the Company or be provided with any products and/or services offered by the Company.

3. Clients are responsible for ensuring that the Personal Data they provide to the Company by themselves or through a third party and recorded in their account remain accurate and up to date throughout their contractual and/or business relationship with the Company.

4. In addition, the Company lawfully gathers and processes Personal Data from publicly available sources (including, among other things, social media, the press, third-party risk management software solutions and the Internet to ensure the accuracy of the delivered information and meet its regulatory obligations. In addition, the Company may gather anonymous demographic data about you, including your ZIP code, age, gender, preferences, and hobbies. The Company may also collect additional data for testimonial and experience reasons.

5. We may also automatically and indirectly collect other information from you, which we use purely for verification and security purposes, such as your (I.P.) address, HTTP headers, browser type, browser data fingerprint, operating system, software and hardware configuration information, domain names, access times, Internet service provider (ISP), MAC ID, Web beacons, geolocation data, pixel tags, referring website addresses and cookies. The Company is using this information for the operation of its Platforms, to maintain the quality of its services, and provide statistics concerning the use of the Company's Platforms.

6. Since payments are made through third parties, we do not, at any time, collect the information you use when making any such payments. Such third parties have their own terms and conditions for using their services; as such, we cannot and do not assume any liability of any kind concerning the use of such third-party services. You must know such terms and/or conditions when making payments through third parties.

7. Please remember that if you directly disclose personally identifiable or sensitive data through the Company communication services, others may collect and use this information.

8. The Company advises you to read the privacy policies of any websites you choose to link to from our website so that you know how those websites manage the gathering, use, and sharing of your personal data. The privacy policies and/or other information on other websites are not our responsibility.

9. Users and/or clients who wish to utilise our services may be required to complete a form, which entails giving the Company some personal data. Answers to our questions about personal information are unnecessary unless it says so in a field marked explicitly as needed. The services and information we may provide will not be affected if you do not fill out the necessary information in these optional fields. Nevertheless, we will only be able to give you the services or information you want if you fill out the required fields or give us the correct information.

10. We use various methods to gather data for you, including but not limited to the following



- **Via Direct interactions.** Providing us with your Identity, Contact and Personal Data (as defined above) by filling in forms or communicating with us by post, email, phone, or otherwise. This includes personal data you give us when you:
  - A. Express your interest in creating an account on our Platform;
  - B. Provide information and/or documents for verifying an account on our Platform;
  - C. Access our Platform and use our Services;
  - D. Ask for marketing material to be sent to you; or
  - E. Provide us with your feedback or even contact us.
- **Via Automated technologies and/or interactions.**

As you interact with our Platforms, we will automatically collect Technical Data regarding your equipment, browsing actions and patterns. We may collect this data using cookies, server logs and other similar technologies.

- **Via Third parties and/or publicly available sources.**

We may obtain personal data about you from several third parties and public sources, including but not limited to social media, search engines, Companies House, Electoral Register, KYC service providers (including e-KYC) and screening data vendors.

11. The Personal Data that the Company collects from the Client and processes is necessary for communication, identification, verification, and authentication, as well as the evaluation of any potential or current contractual relationships between the Company and the Client. It is also used to see if a contract is being conducted the way the Law says it should be. Depending on what products and/or services the Client receives from the Company, the Company may ask to collect the following personal data from the Client:

- Contact details including but not limited to the Client's name, email address, home and/or work address, and telephone number.
- Identification documentation may include but is not limited to the Client's passport and/or national identification card number.
- Demographic and biographical information includes the Client's gender, age, race, level



of education, occupation, and whether he has a high-profile job, such as a prominent public function or the status of a politically exposed person (PEP).

- Financial information includes but is not limited to the Client's income status, bank account number, tax information, and other financial information.
- Information relevant to the services the Company provides and/or intends to provide to the Client includes but is not limited to the Client's current financial trading experience and financial situation, any previous trading activity, transaction history, and account balance information from other related activities.
- Information collected about clients and visitors to the Company's website through cookies and other tracking technologies, such as I.P. address, domain name, browser version, operating system, and geolocation.
- To the extent required and/or permitted by applicable Law, information about criminal offences and convictions.
- Information concerning the Client's mobile device Call log with the Client's permission and other communication records with the Company.
- Any marketing and/or related preferences and/or interests. The abovementioned data may be requested to be accompanied by third-party evidence such as Proof of Identity via passport and Proof of Address, i.e., where you permanently live.



## Data Collection from Children

1. The Company is aware of the value of safeguarding children's privacy.
2. Children under the age of eighteen (18) are not permitted to use the Company's services, and children are not entitled to visit the Company's Platforms.
3. As a result, the Company neither intentionally nor deliberately collects personal data about children.
4. If the Company unintentionally or mistakenly gathers such data, it shall immediately destroy the data after learning of the error.
5. The Client must alert the Company if he/ she learns that such data is being collected at [support@connextfx.com](mailto:support@connextfx.com)

## Management and Use of Personal Data

1. The Company sometimes needs to collect and process Personal Data to establish, maintain, and assess a contractual relationship between itself and the Client. In certain circumstances, the



Company may also use the Client's Personal Data to further its or third parties' legitimate interests, provided that the Client's interests and fundamental rights are not outweighed by those of the Company or the other party. This procedure is conducted for the Company to comply with this Policy and any other applicable financial services laws and regulations.

2. We keep our users' and/or clients' personal data safe. Under the premise of providing specific services to its clients, the Company may need to disclose data to third parties on a "need-to-know" basis. All such third parties are obligated to keep your information confidential and are not permitted to use it for any other reason and/or purpose than to perform these services for the Company. No user or client data is given out, sold, rented, leased, transferred, or otherwise disclosed by the Company to unauthorised, unrelated third parties.

3. Sensitive personal data such as race, religion or political affiliations are not disclosed except with your explicit consent.

4. Your personal information is gathered and used by the Company to run its platforms and provide the services you have asked for. Your personally identifiable information is also used to inform you about additional goods and services offered by the Company and its affiliates. The Company may also use surveys to contact you and learn what you think of existing services or potential new ones.

5. The Company may keep track of the websites and other places, such as applications our users and/or clients visit within our Platforms to determine which of our services are the most popular. Users and clients whose behaviour suggests they are interested in a particular subject area are provided with customised content and advertising within the Company using the data collected from them.

6. The Company may sign collaboration contracts with unaffiliated third parties to enhance user and client services and conduct functions such as user/client services, consumer behaviour





surveys or similar activities relevant to business and with specific regard to the services we provide.

7. The Company will only disclose your personal information without prior notice if obliged by the Law or if the Company has a good faith belief that disclosing such information is necessary to:

- abide by the rules and/or regulations or respond to legal processes served on the Company or the Platforms;
- protect and defend the rights and/or property of the Company; and
- take urgent action to ensure the public's or users' personal safety.

8. In particular, the following scenarios represent the most frequent uses of the Client's Personal Data:

(a) When the Company must perform the contract, which it has already entered or intends to enter with the Client.

Processing of Client's Personal Data is necessary for the Company for:

- verifying the Client's identity;
- conducting regular credit checks, if necessary;
- safeguarding that the Client meets the required suitability requirements for using the Company's products and services and the Platforms;
- managing the account the Client holds with the Company;
- using our pseudonymized details to show to Client ads on social media platforms such as Facebook or through third-party advertisements that may appear on other websites he/she uses;
- preventing, detecting, and reducing fraud and credit risk;
- processing the Client's transactions; and
- sending the Client any information relating to his/her transactions.



The Company might not be able to provide the Client with any of its products and/or services if the Client refuses to provide the requested Personal Data.

(b) Where the Company must comply with a legal obligation

The Company may need to comply with certain legal and regulatory obligations involving processing Personal Data. Such duties and requirements imposed on the Company necessary data processing activities for identity verifications, tax law, compliance with court orders or other reporting obligations and anti-money laundering controls.

(c) Where the Company has legitimate interests in using the Client's Personal Data

The following are some reasons the Company might process the Client's personal data:

- Development and/or enhancement of its products and services.
- Improve the security of the Company's network and/or information systems.
- Identification, prevention and investigation of fraud and other unlawful activities.
- Maintenance of its accounts and records.
- Management of its business operations and compliance with legitimate internal policies and procedures.
- Defence, investigation and prosecution of legal claims.
- Receipt of professional advice (such as legal advice), and
- Analysis of statistical information and/or data which supports the Company to provide its Clients with better products and services in the future. Only for statistical purposes and to enhance a Company's marketing campaign, the Company may
- give this statistical information and/or personal data to third parties (as further explained in Section

8). The Client should note that the Company aggregates and anonymises such data to prevent any direct or indirect identification of the Client.

(d) In cases where the Client has given his/her consent

- The Company will ask clients' permission to access their device call log to complete the phone number verification process.
- The Company will ask clients' permission to electronically verify their identities by providing their personal information to identity verification services.
- The Client has the right to withdraw his/her consent at any time. This right preserves the fact that the Company could have used the Client's personal information up until the point of withdrawal. This right leaves unaffected the lawfulness of processing the Client's personal data, which took place until that moment before its withdrawal.

## Cookies

1. A cookie is a short text file kept as a record-keeping tool on a user's computer and/or other electronic devices, like a cell phone. The Company uses cookies on its website(s) to safeguard and deliver a beneficial browsing experience while enabling us to enhance our website.

2. "Cookies" may be used on the Company's website and/or Platforms to provide you with several interactive features and enhance your online experience. A cookie is a text file that a website server stores on your computer's hard drive. Cookies can neither run programs on your computer nor spread viruses. Only a web server in the same domain as the site that gave you the cookie can read it.

3. One of the principal purposes of cookies is to provide you with the convenience of saving time.

4. A cookie's job is to let the web server know when a user has revisited a particular page. For instance, if you personalise the Company's pages or register with the Company's website or services, a cookie assists the Company in recalling your specific information on subsequent visits. When you return to the same website, the information previously provided can be retrieved so that you can easily use the Company's features and Platforms that you have already customised. Additionally, cookies help us learn more about you by providing technical data that we may use



to streamline your experience with our products and services and enhance navigation and ease of use of our Platforms.

5. When you visit our website, advertisements may be served by third-party advertising companies. These businesses may send you advertisements for products and services that they think you might be interested in using information about your visits to this and other website(s) but not your name, address, email address, or phone number.

6. The ability to accept or decline cookies always remains with you. Even if your web browser automatically accepts cookies, you can usually modify it to decline cookies. You can learn more about cookies at <https://www.aboutcookies.org/>

7. To understand more about the kind of cookies we use and how you can control and delete cookies, please see our Cookie Policy.

Links to other websites

1. This Privacy Policy Statement solely applies to this website and related Platforms. Links to third-party websites are provided for the sole purpose of convenience to our users and/or clients within the context of their interests and concerning the services we provide. As such, we aim to ensure that such websites are of the highest standard. However, we cannot guarantee the standards of such linked websites, and we are not liable for their content due to the nature of the Internet.

2. Links to other websites and/or social media platforms may exist on the Company's website and/or Platforms. However, you should be aware that the Company has no control over those other websites once you have used those links to leave the Company's website. As a result, the Company cannot guarantee the security and privacy of any data or information you supply while visiting these sites. Please be aware that these websites are not subject to this Policy and are not required to follow it. Exercise caution and review the privacy policy and related statement(s) that applies to the website(s) mentioned above.



3. The Company disclaims all responsibility for the improper and/or non-authorized use of the Client's personal data caused by the Client's or a third party's misuse, malicious use, carelessness, or loss of the Client's passwords.

### Client Records Retention Periods

1. We will only keep personal data if it is necessary to accomplish the goals for which it was initially collected, including meeting any legal, tax, accounting, regulatory, technical, or reporting requirements. In the event of a complaint or if there may be a chance of litigation involving our relationship with you, we may keep your personal information for longer.

2. When determining the proper retention period for personal data, we take into account several factors, including the volume, nature, and sensitivity of the data, the risk of harm from unauthorised use or disclosure, the purposes for which we process the data, and whether those purposes can be fulfilled by other means, as well as any applicable legal, regulatory, tax, accounting, or other requirements.

3. For compliance reasons with this Policy, we retain our customers' basic information (including contact details, identity card, financial information, and transaction data) for a minimum of five (5) years after they stop being our clients. When the Company determines that personal information is no longer required for the purpose for which it was collected, the Company has the right to delete all data received from the Client.

### Sharing and Disclosure of Personal Data

1. The Company may disclose the Client's Personal Data to third parties while conducting its contractual and legal obligations.

Most of these third parties enter contracts with the Company that require them to respect data privacy and confidentiality.

2. Under the abovementioned circumstances, recipients of Personal Data may be anyone from the following examples:

- Third-party payment service providers who help the Company provide its Clients with the services of securely depositing and withdrawing to and from the Client's account;
- Service providers that the Company selected to support it in the adequate provision of its products and/or services by providing technological solutions and support;
- Governmental agencies and regulatory bodies, including law enforcement agencies, in connection with inquiries, actions, or investigations by such parties or to make it possible for the Company to adhere to its legal and
- regulatory obligations;
- Agencies that provide credit references and fraud protection, third-party authentication service providers, and other financial institutions for controls on credit checking, fraud protection, and anti-money laundering;
- utilizing third-party service providers for the necessary live chat customer support services as well as cookies to track website traffic and website visits for the Company;
- external consultants, including legal and tax consultants;
- data reporting service providers;
- market research companies and call centres; and
- affiliates of the Company;

3. The Company does not gather, store, or process personal credit or debit card information. All payment transactions are processed through payment service providers.

## Business Transfers Legal Requirements

1. The Client's Personal Data and other information may be transferred to a successor or affiliate as part of that transaction, along with other assets, if the Company engages in a merger, acquisition, financing due diligence, reorganisation, bankruptcy, receivership, sale of company assets, or transition of service to another provider.



## Marketing Communications – Preferences - Spamming

1. The Company may contact you by electronic or other communication at any time to provide information on its products, marketing materials and training and/or to enquire evaluation of its services. You can unsubscribe from this application anytime by using the link at the bottom of every email you receive or contacting our support staff.
2. The Company may process Personal Data to tell its Clients about products, services, and offers that may interest the Client. The Company may only process such Personal Data with the Client's express consent.
3. If the Client decides he/she no longer wants to receive promotional communications, he/she can change his/her email subscription preferences by following the instructions in each communication or contacting our support staff.
4. We never send "spam." Spamming describes sending many unsolicited emails, usually about business, to people who have said they do not want them or with whom the sender has never talked.

## Personal Data Rights

1. The following rights apply to clients' personal data:
  - Accessibility: The Client is entitled to know whether the Company is managing his or her personal data and, if so, to receive a copy of that data.
2. Right to rectification: If any of the Client's Personal Data is inaccurate or incomplete, the Client has the right to request that the Company complete it.
3. Right to erasure: This gives the Client the right to request that the Company erase or otherwise dispose of his Personal Data in certain situations, such as when the Client withdraws his consent.

4. Right to restrict processing: This enables the Client to ask the Company to limit the processing of the Client's Personal Data if:

- it is inaccurate;
- even though it was misused, the Client does not want it deleted;
- it is no longer relevant, but the Client requests that the Company retain it for use in potential legal claims;
- The Client has already requested that the Company cease using his Personal Data, but he is awaiting confirmation from the Company that it has legal justification for doing so.

5. Right to data portability: The Client has the right to obtain his/her Personal Data provided to the Company in a structured, commonly used, and machine-readable format.

6. Right to object: The Client may request that the Company stop processing his/her Personal Data at any time, and the Company shall comply if either of the following conditions exists:

- The Company is processing the Client's Personal Data for direct marketing, or
- the Company is unable to provide compelling legitimate grounds for the processing.

7. Rights concerning automated processing, decision-making and profiling: The Client is entitled to be free from decisions about him or her that are solely based on automated processing of his or her Personal Data, including but not limited to profiling, unless such profiling is necessary for entering into or having an impact on the performance of a contract between the Client and the Company, and/or the Client gives explicit consent.

8. Right to withdraw consent: If the Company relies on the Client's consent to process his/her Personal Data, the Client has the right to withdraw that consent at any time. This will not impact the processing's ability to proceed legally based on the Client's prior consent.





9. Right to complain: If the Client has any concerns about the Company's privacy policies, including how the Company manages his or her personal data, the Client is free to bring those concerns to the attention of the appropriate data protection authority if one exists.

You will not be charged a fee to access your personal data (or to exercise any of the other rights). The Client may contact the Company to exercise the previously mentioned rights. We may charge you a reasonable fee if your request is unreasonable, makes no sense, or is not based on facts. In these situations, we could also decline to abide by your request at

[privacy@connextfx.com](mailto:privacy@connextfx.com).

### Automated decision-making and profiling

1. When you apply for an account opening, we will use systems to create an automated assessment of your knowledge and experience by evaluating an appropriateness test. Based on the results of such a test, we assign the appropriate leverage to your trading account. In such cases, you have the right to contact us to:

- Give you information about the processing of your personal data (please also see Section 11 of this Policy about your rights); and/or

2. Request that one of our employees examines your application and obtain an explanation for the automated decision reached. Following such a request, we will reassess your application, considering both the reasons that a particular automated decision was reached and your own point of view. You also have the right to challenge such a decision

### Confidentiality and Security of Personal Data

1. The Company will treat any personal data as confidential and only uses it for the purposes outlined in this Policy.

2. The Company will treat any Personal Data the Client provides as confidential and only disclose it to the parties listed in Section 8 of this Policy. Except in cases where disclosure is required by Law or regulation, such personal data will not be disclosed to any other third parties.



3. The Company highly protects the Client's Registration Information. Registration information is defined as personal information submitted by the Client when registering for services or as a user of the website(s). The Company takes all necessary precautions to prevent unauthorised parties from viewing such information by encrypting all Personal Data before it is transferred to the Company. The Client's encrypted password, known only to the Client, allows him to access his registration information. The Client is required to exercise caution and keep his password private and secure. Registration information is safely saved on safe servers that only authorised personnel with a password can access.

4. Non-Registration Information Personal Data submitted to the Company is stored on secure servers and is again only accessible by authorised personnel with a password. No password is given to view or modify this information because the Client cannot access it.

5. Personal data we collect from you is safely stored via physical, electronic means and procedural controls, and it is always treated confidentially. These controls are designed to:

- Ensure the security and confidentiality of the user's and/or Client's records and information;
- protect against any threats and/or hazards to the security or integrity of the user's and/or Client's records and information; and
- protect against unauthorised access to and/or use of the user's and/or Client's documents or information that could result in substantial harm or inconvenience thereto.

6. The Company secures your personal information from unauthorised access, use and/or disclosure. Your personally identifiable information is safely stored in our electronic systems, secured on computer servers in a highly controlled, secure environment, and protected from unauthorised access, use and/or disclosure. It is always treated confidentially and protected by Data Protection laws. Personal information, including credit card numbers, is encrypted before being sent to other websites. Our Policy prohibits us from disclosing user or client information to unaffiliated third parties unless you permit us to do so or when doing so is necessary for legal or regulatory requirements.



7. Notwithstanding the above, there are certain cases where information cannot be considered confidential. This occurs where it can be proved that such information is:

- already publicly available through no act or omission of the recipient or any other third party owing an obligation of confidence to the receiver;
- received lawfully from a third party without any restrictions as to its use or disclosure; and
- required to be disclosed under the legal or regulatory requirements.

### Amendments to this Policy

1. The Company retains the right to periodically review and modify this Policy for any reason and to provide notice of any such modifications to Clients by posting an updated version of this Policy on the Company's website (s).

2. The Company will occasionally update and/or amend this Privacy Policy statement to reflect Company and user/client feedback and keep it in line with legal requirements. The Company encourages you to review this statement periodically to keep yourself informed of how the Company protects your information.

3. You can always stay informed about the data we collect, how we use it, and when we disclose it by checking back on this page whenever this Privacy Policy Statement is updated or amended.

4. The Client must regularly review the Policy and any updates to it.

### Enquiries and Contact Details

1. For any general enquiries regarding this Policy, do not hesitate to contact the Company by emailing the Customer Support Department at [support@connextfx.com](mailto:support@connextfx.com).



2. For any requests concerning personal data rights, as set out in Section 11 of this Policy, or questions about how the Company processes Client's Personal Data, don't hesitate to get in touch with us at [privacy@connextfx.com](mailto:privacy@connextfx.com)

3. The Company welcomes your comments and feedback regarding this Privacy Policy statement. If you believe that the Company has not adhered to this statement, do not hesitate to contact the Company as per the Terms of Service and Conditions, Article 19. We shall use all reasonable efforts to determine and remedy the matter promptly.

