

PRIVACY POLICY

Version 01.2023



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1. Introduction / RECITALS

1.1. FXGlobe Limited (hereinafter the “Company”) is committed to protect your privacy and handling your data through a transparent manner. The Company understands the importance of maintaining the confidentiality and privacy of your personal data. By entrusting us with your information, we would like to assure you of our commitment to keep such information private. We have taken measurable steps to protect the confidentiality, security and integrity of your information.

2. PRIVACY NOTICE

2.1. This Privacy Notice describes how FXGlobe Limited (‘the Company’, ‘we’, ‘us’ and/or ‘our’) collects and uses information provided to us by you or a third party, and/or through our site www.fxglobe.eu and any other related sites and applications, including amongst others, in connection with our provision of services to you or which we collect from your use of our services.

2.2. This Privacy notice aims to provide you an overview of how the Company collects and processes your personal data and informs you about your rights under the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation - hereinafter, “GDPR”), as well as Law providing for the Protection of Natural Persons with regard to the Processing of Personal Data and for the Free Movement of such Data of 2018 (Law 125(1)/2018) (hereinafter, “the Laws”) as amended from time to time. This statement is directed to natural persons who are either current, past or potential clients of the Company and their representatives (such as attorneys acting on their behalf).

2.3. We reserve the right to change and amend this policy from time to time. The most current policy version will govern any personal information we hold on you.

2.4. We will update this privacy notice when necessary and at least once a year, in order to reflect any new technology changes, our operational and practices changes, new laws and regulations, any customer feedback and any other matter that the case may be. When we post changes to this privacy Policy, we will revise the “Effective Date” at the top of the Policy document.

2.5. We encourage you to periodically review this privacy policy to learn how changes are implemented and the how we process your information.

2.6. This privacy policy does not apply to websites operated by other organizations and other third parties.

3. OUR COMMITMENT TO YOU

3.1. The company understands the importance of maintaining the confidentiality and privacy of your information and is committed in taking all reasonable steps in safeguarding any existing or prospective clients, applicants and visitors. We have taken measurable steps to protect the confidentiality, security and integrity of your information.



3.2. Data protection law obliges us to manage your personal information in the following way:

- Use it lawfully, fairly and in a transparent way.
- Collect it only for valid purposes which shall be clearly explained to you and not used in any way that is incompatible with those purposes.
- Shall be relevant to the purposes and limited only to those purposes.
- Shall be accurate and kept up to date.
- Kept only as long as necessary for the purposes.
- Shall be kept securely.

4. COLLECTION OF INFORMATION

4.1. If you decide to apply to open an account with us and hence become our client there is certain information that we will require from you, in order to be able to do so.

4.2. Information will be collected directly from you (in your completed account opening Application Form or other way) or from other persons including, for example, credit reference agencies, fraud prevention agencies, banks, other financial institutions, third authentication service providers and the providers of public registers. This information includes, but is not limited to personal details such as name, address, date of birth, contact details, payment details, including credit card, debit card and bank account details, and other necessary financial information. With the acceptance of this Policy which is an inseparable part of the FXGlobe Client Agreement, you acknowledge and accept that your personal data will be collected, stored and processed by the Company according to all the relevant laws and regulations the Company needs to abide with. Your information will be kept encrypted.

4.3. As part of the Company's client account opening procedures and ongoing obligations, needs to abide with the legislative framework currently in place with the Cyprus Securities and Exchange Commission ('CySEC'). Specifically, the Company shall comply with its legal obligations under the Prevention and Suppression of Money Laundering Activities Law of 2007 - 2019, as amended, for the establishment on the Client's economic profile and prevention of money-laundering as well as abide with the relevant record keeping obligations under the European Commission Delegated Regulation (EU) 2017/565 supplement in Directive 2014/65/EU of the European Parliament and of the Council as regards organisational requirements and operating conditions for investment firms and defined terms for the purposes of that Directive ('Delegated Regulation') and Law regarding the provision of investment services, the exercise of investment activities and the operation of regulated markets N. 87(1)/2017 for establishing the suitability and appropriateness of each Client based on the services offered by each CIF (Suitability & Appropriateness Tests) and recordings of telephone conversations, client transactions, the Foreign Account Tax Compliance Act (FATCA) and the Common Reporting Standard (CRS). The Company based to the above-mentioned, collects and maintain the following:

- i. Name and Surname
- ii. Date of Birth
- iii. Place of Birth
- iv. Nationality
- v. Copy of the Passport and/or of the Identity Card



- vi. Utility bill (including the full address of the client)
- vii. Tax Identification Number
- viii. Tax Residence
- ix. Telephone number
- x. Email
- xi. Employer's name
- xii. Profession
- xiii. Industry of Employment
- xiv. Gross Annual Income
- xv. Net Worth
- xvi. Anticipated amount to invest
- xvii. Bank Account Details
- xviii. Knowledge and experience

4.4. We may ask for other personal information voluntarily from time to time and if you choose not to provide the information, we require to fulfil your request for a certain product or service, we may not be able to provide you with the requested product or service. Please note that we keep records of your trading history including:

- products you trade and their performance
- products we trade on your behalf and their performance
- historical data about the trades and investments you made including the amount invested
- your preference for certain types of services and products

4.5. The Company may also collect your information regarding your use of our website(s), such as pages visited, frequency, duration of visit and trading activities.

Our web pages and e-mails may contain web beacons or pixel tags or any other similar type of data analysis tools which allow us to track receipt of correspondence and to count the number of users that have visited our webpage or opened our correspondence. Where your personal information is completely anonymized, we do not require a legal basis as the information will no longer constitute personal information. However, where your personal information is not in an anonymized form, it is in our legitimate interest to continually evaluate that personal information to ensure that the products and services we provide are relevant to the market. We may also obtain personal information about you through your use of website or through the use of cookies on our websites, in particular by recording which pages you look at on our websites.

4.6. From time to time we may also request further information to help us improve our service to you under our relevant Agreement or comply with Applicable Regulations. The Company will do its best to collect only the information necessary in order to adhere with the relevant laws and regulations and avoid collecting more documentation than necessary.

5. USE OF THE INFORMATION

5.1. The Company will use, store, process and handle your personal information (in case you are a natural



person) in connection with the furthering of the Agreement between us, in accordance with the provisions of the Law, as amended or replaced from time to time in compliance with the European GDPR legislation. Your information (not in the public domain or already possessed by us without a duty of confidentiality) which we hold is to be treated by us as confidential and will not be used for any purpose other than in connection with the provision, administration and improvement of our services to you or the furthering of our Agreement between us, establishing and managing your account or a relationship between us, reviewing your ongoing needs, enhancing customer service and products, giving you ongoing information or opportunities that we believe may be relevant to you, improving our relationship, anti-money laundering and due diligence checks, for research and statistical purposes.

- 5.2. For the purpose of verification of your identity and for all the purposes stated above, we may carry out credit and/or checks with third parties on our behalf. It is in our legitimate interest to do so and the use of your personal information in this way is necessary for us to know who you are as we also have a legal obligation to comply with certain Know Your Customer regulatory obligations.
- 5.3. By entering an Agreement with us (to become our Client), you will be consenting to the transmittal of Your Personal Information outside the European Economic Area, according to the provisions of the Laws. Additionally, you are consenting to the fact that if you terminate your business with us and close your account accordingly, we shall be entitled to retain records of your information we have received during our business relationship, for the purpose of meeting our regulatory obligations (as specified in the relevant laws and applicable to our business activities).
- 5.4. Upon account opening we will need to use your personal information to perform our services and comply with our obligations to you. Also, we may have to create profiles about you so that we understand your needs and, also, to ensure that we provide you with the very best products and services we can and even sometimes create limits to your profile that may affect your ability to use our services. It is in our legitimate interests to ensure that we provide you with the best products and services so we may regularly review your needs to ensure that you get the best possible products and services from us. We may from time to time use personal information provided by you through your use of our services and/or through customer surveys to help us improve our products and services.
- 5.5. Where we consider there to be a risk that we may need to defend or bring legal claims, we may retain your personal information as necessary for our legitimate interests in ensuring that we can properly bring or defend legal claims. We may also need to share this information with our insurers or legal advisers. How long we keep this information for will depend on the nature of the claim and how long we consider there to be a risk that we will need to defend or bring a claim. It is in our legitimate interests to use your personal information in such way.
- 5.6. We may need to use your personal information to comply with applicable law, court order or other judicial process, or the requirements of any applicable regulatory authority. We do this not only to comply with our legal obligations but because it may also be in our or your legitimate interest to do so.
- 5.7. We may need to process your personal information for internal business and research purposes and record keeping purposes. Such processing is in our own legitimate interests and is required in order to comply with our legal obligations. This may include any communications that we have with you in relation to the services we provide to you and our relationship with you. We will also keep records to ensure that you comply with your obligations under any contract you have entered into with us. (Such records shall include also any visits to our premises).
- 5.8. We may share your personal information with partners who provide services on our behalf or have introduced you to us and/or with other entities in our group as part of our regular reporting activities on



company performance, in the context of a business re-organization or group restructuring exercise, and for system maintenance support and hosting of data. It is in our legitimate interest to use your personal information in such way.

- 5.9. We shall record any communications, electronic, by telephone, in person or otherwise, that we have with you in relation to the services we provide to you and our relationship with you. These recordings will be our sole property and constitute evidence of the communications between us. Any telephone conversation may be recorded without the use of a warning tone or any other further notice.

6. CONTACTING YOU

- 6.1. We may, for administering the terms of our Agreement between us, from time to time, make direct contact with you by telephone, fax, email, or post.
- 6.2. If you agree, the Company's employees and/or officers and/or representatives may make contact with you from time to time, by telephone, fax, email or post for marketing purposes to bring to your attention products or services that may be of interest to you or to conduct market research.
- 6.3. You always have the option to "opt out" from receiving any kind of communication from us at any time by pressing the relevant "contact us" and/or "unsubscribe" button, as the case may be.
- 6.4. We never share your name or contact details with third parties, either for marketing purposes or whatsoever, unless we have your "opt-in" consent to share your details with a specific third party for them to send you any type of communication.
- 6.5. We do use third party service providers to send out our communication, but we only allow them to use that information on our instructions and where they have agreed to treat the information confidentially and to keep it secure. It is in our legitimate interest to use your personal information in such way. We retain your details on our list until you "opt-out" at which point we add you to our suppression list. We keep that suppression list indefinitely to comply with our legal obligations.

7. DISCLOSURE OF INFORMATION

- 7.1. Under the Agreement between us, we have the right to disclose your information (including recordings and documents of a confidential nature, card details) in certain circumstances. According to the Agreement between us, your information may be disclosed:
- where required by law or a court order by a competent Court;
 - where requested by our Supervisor (the Cyprus Securities and Exchange Commission) or any other regulatory authority having control or jurisdiction over us or you or our associates or in whose territory we have Clients, as applicable;
 - to relevant authorities to investigate or prevent fraud, money laundering or other illegal activity;
 - a Broker so as to execute your Instructions or orders and for purposes ancillary to the provision of our Services to you as our Client;
 - to credit reference and fraud prevention agencies, third authentication service providers, banks and other financial institutions for credit checking, fraud prevention, anti-money laundering purposes, identification or due diligence checks of you. To do so they may check the details you supplied against



any particulars on any database (public or otherwise) to which they have access. They may also use your details in the future to assist other companies for verification purposes. A record of the search will be retained by us;

- f) to our professional advisors provided that in each case the relevant professional shall be informed about the confidential nature of such information and commit to the confidentiality herein obligations as well;
- g) to other service providers who create, maintain or process databases (whether electronic or not), offer record keeping services, email transmission services, messaging services or similar services which aim to assist us collect, storage, process and use your information or get in touch with you or improve the provision of our services or activities under the Agreement between us;
- h) to a Trade Repository or similar;
- i) to other service providers for statistical purposes in order to improve our marketing, in such a case, the data will be provided in an aggregate form;
- j) where necessary in order for us to defend or exercise our legal rights to any court or tribunal or arbitrator or Ombudsman or governmental authority, as the case may be;
- k) at your request or with your consent;
- l) to our Affiliates or any other company in our group;
- m) to our employees so as to exercise their duties to further the Agreement between us, or to assure the efficient functioning of our Platform.

7.2. Generally, we require that third parties who handle or obtain your personal information acknowledge the confidentiality of this information, undertake to respect any individual's right to privacy and comply with all the relevant data protection laws and this privacy notice. Where any third party uses your personal data as data controller, such use is not covered by this privacy notice and is not subject to FXGlobe's privacy practices and procedures.

7.3. We may transfer your personal information outside the European Economic Area ("EEA") to our other group companies as well as processors who are engaged on our behalf. To the extent we transfer your information outside the EEA, we will ensure that the transfer is lawful and that there are appropriate security arrangements.

7.4. In order to transfer personal information to third parties in territories where applicable legislation may not be adequate, we will ensure that the transfer is lawful and that there are appropriate security arrangements.

8. COOKIES

8.1. The Company may also collect Your Information in regard to your use of our website(s), such as pages visited, your IP address, frequency, duration of visit and trading activities.

8.2. You may program your device to block cookies but be aware that such blocking may prevent us from providing you some or all of the services and features of the site, or address any of your requests in an optimal manner.



9. PROCESSING YOUR PERSONAL DATA WITHOUT YOUR CONSENT

In certain circumstances the company can process your data without your consent. The following are considered to be the most relevant:

- I. Processing is necessary for the performance of a contract to which the person is party, or in order to take measures of the person's request prior entering into a contract. The Company processes personal data in order to provide its services based on the contractual relationship with its clients (i.e. so as to perform its contractual obligations). In addition, processing of personal data takes place to be able to complete the client on-boarding/ acceptance procedures and to enter in contractual relationship with the client.
- II. The Company must comply with various legal obligations and requirements (e.g. anti-money laundering laws, financial regulation laws, tax laws etc.) which are sufficient as a legitimate basis for processing of personal data.
- III. Processing is necessary for the purposes of the legitimate interests pursued by the controller or by the third party to whom the personal data are communicated, on condition that such interests override the rights, interests and fundamental freedoms of the persons. For instance, personal data might be processed in connection with litigation, internal reporting, statistical processes etc.

10. PROCESSING YOUR PERSONAL DATA WITH YOUR CONSENT

- 10.1. If processing of your personal data is not based on reasons described above ("Processing your personal data without your consent") it is based on your consent. For example, you might agree that your personal information will be used to send you marketing communications by email or phone or other agreed forms. The consent shall be provided freely, specific, informed and an unambiguous indication of your desires, which by statement or by clear affirmative action, signifies agreement to the processing.
- 10.2. Where the use of your personal information by us requires your consent, such consent will be provided in accordance with the applicable Terms and Conditions governing our relationship with you, and available on our website(s), or any other contract we may have entered into with you, or stipulated in our communication with you from time to time, including this Privacy Notice.
- 10.3. By using our services means you have accepted and agreed to this policy. Please give a great attention to Clause 4 and 5 above, however this policy shall be read as a whole and accepted as a whole not partially).
- 10.4. Where we rely on your consent as our legal basis for processing your personal information, you have the right to withdraw your consent at any time by contacting us using the contact details set out below.
- 10.5. You have the right at any time to withdraw that consent by contacting us via email at info@fxglobe.eu



11. RETENTION OF YOUR PERSONAL DATA

The Company shall keep your personal data for as long as the company has business relationship with you. Retention periods will be determined taking in account the type of information that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable time.

12. SAFEGUARD MEASURES

- 12.1. Your information is stored on secure servers.
- 12.2. We have ensured and taken measures and precautions to protect the security of your personal information.
- 12.3. We limit access of your information only to those employees or partners that need to know the information in order to enable the carrying out of the Agreement between us. Those employees and partners, that have access to your personal information by way of necessity, understand and respect the confidentiality of your personal information.
- 12.4. We have procedures in place regarding how to safeguard and use your information, for example by requesting our employees to maintain the confidentiality of your information.
- 12.5. We hold personal information in secure computer storage facilities, paper-based files, and/or other records. When we consider that personal information is no longer needed, we will remove any details that will identify you and we will securely destroy the records. Please note that we are subject to certain laws and regulations which require us to retain a copy of the documents we used to comply with our customer due diligence obligations, and supporting evidence and records of transactions with you and your relationship with us for a period of five (5) years after our relationship with you has ended.
- 12.6. We will not keep your information for any longer than is required. In many cases, information must be kept for considerable periods of time. Retention periods will be determined taking into account the type of information that is collected and the purpose for which it is collected, bearing in mind the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable time. Under Applicable Regulations, we will keep records containing Client personal data, trading information, account opening documents, communications and anything else which relates to the Client for at least five (5) years after termination of the Agreement between, as stated above. In any event, we will keep your information for the duration of applicable Limitation of Actions Laws as a minimum.
- 12.7. If we hold any personal information in the form of a recorded communication, by telephone, electronic, in person or otherwise, this information will be held in line with local regulatory requirements which will either be five (5) or seven (7) years after our relationship with you has terminated. Where you have opted out of receiving marketing communications, we will hold your details on our suppression list so that we know you do not want to receive these communications.
- 12.8. While we will use all reasonable efforts to safeguard your information, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data transferred from you, or to you via the internet.



13. YOUR RIGHTS

- 13.1. Under the General Data Protection Regulation, as amended or replaced from time to time, you as a natural person have a number of rights when it comes to personal information, we hold about you. More information about your rights can be obtained from the Office of the Commissioner For Personal Data Protection (<http://www.dataprotection.gov.cy>)
- 13.2. Under certain circumstances, by law you have the right to:

13.1.1. RIGHT TO BE INFORMED AND RIGHT TO ACCESS

To know about how we use your personal information and about your rights. This is why we are providing you with the information in this notice. If you require any further information about how we use your personal information, please contact us using the details provided below. As a natural person you have the right to require confirmation whether we are processing your personal information and to obtain a copy of any personal information which we hold about you. Additionally, you may also request the reasoning of holding such information. If you require additional copies, we may charge you a reasonable administration fee. To make a request, please contact us, verifying your identity and specifying what information you require. You may contact us via e-mail at info@fxglobe.eu.

13.1.2. RIGHT TO ERASURE AND RIGHT TO OBTAIN THE RECTIFICATION OF INACCURATE PERSONAL DATA

If the personal information we hold about you is inaccurate or incomplete, you are entitled to have it rectified. You may inform the Company at any time that your Information has changed, or that you wish the Company to delete information we hold about you or to rectify it, by emailing us at info@fxglobe.eu. We will change, rectify or delete your information in accordance to your instructions, except to the extent that we are required to hold your Information for regulatory or legal purposes, to provide you with the Services you have requested or to maintain adequate business records. For us continuing to process it (for instance, we may need to continue using your personal data to comply with our legal obligations). You also have the right to ask us to delete or remove your personal information where you have exercised your right to object to processing.

Please Note: *We will change or delete your information in accordance to your instructions, except to the extent that we are required to hold your information for regulatory or legal purposes, to provide you with the services you have requested or to maintain adequate business records in order to abide with the relevant laws and regulations. This shall be the case even after the termination of our business and the purpose of the collection of information is not valid anymore.*

13.1.3. THE RIGHT TO RESTRICT PROCESSING

Object to processing of your personal information where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to us using your information on this basis and we do not have a compelling legitimate basis for doing so which overrides your rights, interests and freedoms (for instance, we may need it to defend a legal claim). You also have the right to object where we are processing your personal information for direct marketing purposes. Under certain conditions stipulated by the applicable legislation you have the right to request that the Company restrict the processing of your personal data.



13.1.4. THE RIGHT TO DATA PORTABILITY

Request the transfer of your personal information to another party where you provided it to us and we are using it based on your consent, or to carry out a contract with you, and we process it using automated means.

13.1.5. THE RIGHT TO WITHDRAW YOUR CONSENT

Withdraw your consent(s) in regards to the collection and use of your personal information. Once we have received notification that you have withdrawn your consent(s), we will no longer process your information for the purpose or purposes you originally agreed to, unless we have another legitimate interest in doing so, and we may close your account if the withdrawal would jeopardize the company by not having you express consent accordingly. In such case the company may terminate the business with you and close your account without giving you explanations or reasonings.

- 13.3. In regard to any right above, we may request from your certain specific information in order to help us understand the nature of your request, confirm your identity and/or ensure your right to access the information (or to exercise any of your other rights) is not being abused by any other third party or unauthorized party. This is another appropriate security measure to ensure that personal information is not disclosed to any person who has no right to receive it.
- 13.4. For the use of any of the above rights please kindly use the below 'Contact us' details and notify us accordingly. We shall act upon your request/instructions promptly.

14. AUTOMATED DECISION-MAKING AND PROFILING

- 14.1. Generally, we do not make decisions about you based solely on an automated process (e.g. through automatic profiling) that affects your ability to use the services or has another significant effect on you. However, if we do so, you have the right to be informed on it and you can request not to be subject to such a decision unless we can demonstrate to you that such decision is necessary for entering into, or performance of, a contract between you and us.

15. COMPLAINTS

- 15.1. If you think that we are using your information in a way which breaches data protection law, you have the right to file a complaint with us using the below 'Contact us' details or with your national data protection supervisory authority (if you are in Cyprus, this will be the Office of the Commissioner For Personal Data Protection).
- 15.2. Please consider your request responsibly before submitting it. We will respond to your request as soon as we can. Generally, we shall follow the company's Complaints Handling procedure (also available on our website for your consideration) which is very specific in terms of timing and process to be followed.



16. CONTACT US

- 16.1. If you have any questions regarding this policy, wish to access or change your information or have a complaint, or if you have any questions about security on our Website, you may email us at support@fxglobe.eu.

Address: 2 Louki Akrita Street, Limassol, 3030, Cyprus

Phone: 00357-22222694.

