

# Privacy Policy

May 2023

FX Investment Group (hereinafter, “the Company”) takes the security of clients’ personal data and the storage of confidential information very seriously.

To prevent any loss, misuse, changes, or unauthorized access of information by third parties, the Company fulfills all relevant requirements (both administrative and technical), i.e. regularly performs checks, tests, and other essential reviews.

The Company respects your right to privacy. This Privacy Policy (hereinafter, "Policy") applies to personal information that is collected from the Company website as well as any other affiliated websites and applications. This Policy does not apply to websites operated by other organizations and other third parties. This Policy also applies to personal information that is collected when you use the Company’s products and services as well as during any correspondence held by telephone, email, or otherwise. This Policy aims to inform you about the type of information gathered by the Company, what it’s used for, how it’s kept secure, and what your data privacy rights are.

## **What personal information is collected by the Company and for what purposes?**

The personal information that may be collected by the Company falls into the following categories:

### **Information that you provide voluntarily**

You can provide the Company with your personal details, contact information, and financial data etc. by filling in forms online or by sending them by post, providing them over the telephone, via myAlpari, email, or any other available method. This includes the personal information you provide when you:

- apply for the Company’s products or services;
- create an account on the Company website;
- subscribe to the Company’s publications or those of affiliated third parties;
- agree to receive promotional materials from the Company;
- take part in a contest, the FX Investment Group Cashback loyalty program, promotion, or survey;
- give feedback.

In addition to the above, certain parts of the Company website may ask you to provide personal information voluntarily. The personal information that you are asked to provide, along with the reasons for which you are asked to provide it, will be made clear to you at the time you are asked to provide such information.

### **Information that the Company collects automatically**

When visiting the Company website, certain information (such as your IP address, device type, browser type etc.) is sent from your device automatically. In some jurisdictions, including European Union member states, this information may be classified as personal information under standard regulations for data protection.

The Company also receives information about how your device has interacted with the website, including the pages accessed and links followed.

Collecting this information enables the Company to conduct analyses of user and Client requests for the purposes of improving the quality of available products and services.

Some of this information may be collected using cookies. More detailed information regarding cookies used by the Company can be found in the Company's Cookie Policy.

### **Disclosure of personal information**

The Company may disclose your personal information to the following categories of recipients:

- Group companies, third-party service providers, and partners who provide the Company with data processing services (for example, to support the delivery of, provide functionality for, or help to enhance the security of the Company website) or who otherwise process personal information for the purposes described in this Policy.
- Any competent law enforcement body, regulatory or government agency, court, or other third party as permitted by law.
- Any other person with your consent to the disclosure of such information.

### **The Company uses your personal data for the following purposes:**

#### **1. Serving you as a client**

**Type of data:** identity (name, country of residence, address, and other similar information); contact details (email address, telephone number, webpage, and other), copies of national identity documents (passport, identity card, residency permit, US residency information, and similar), financial (bank account details, bank card numbers and holder name, documents confirming origin of capital, and other similar), political exposure.

**Purpose:** registering you as a new client, providing the opportunity to open a trading account, providing the opportunity to use the Company's products and services, facilitating non-trading operations in accordance with the Regulations for Non-trading Operations, and collecting information regarding the possibility that funds are owed to the Company.

**Legal basis:** compliance with the Client Agreement, compliance with legal requirements.

#### **2. Managing risk, money laundering prevention, and responding to regulatory requirements and legal claims**

**Type of data:** transactional, financial, identity

**Purpose:** compliance with applicable laws; money laundering detection, investigation, and reporting; responding to complaints; submission of information to applicable governmental bodies in cases where it is required by law; the collection of information where there is a legal obligation to do so for compliance and AML purposes, such as 'know your client' information; information relevant to international sanctions and restrictive measures; and information about unlawful or political activities of a potential client, which may impact the Company's decision to conclude an agreement with the Client.

**Legal basis:** compliance with legal requirements.

### 3. Marketing

**Type of data:** contact information, consent, and correspondence.

**Purpose:** marketing activities and the provision of information concerning the Company's products and services.

**Legal basis:** compliance with the Client Agreement.

#### **Clients have the following rights:**

- To send a request for the correction of any inaccurate information and/or the completion of any incomplete personal information. The Company will subsequently process the request and notify any third parties to whom such personal information may have been transmitted in accordance with the terms set out in this Policy.
- To opt out of receiving any marketing materials sent by the Company to clients.
- To request that the Company stop processing your personal information. Withdrawing consent for personal data processing may prevent you from being able to access certain products and services for which the processing of personal information is necessary.
- Consent to the processing of personal information may be withdrawn at any time. Such withdrawal will not affect the lawfulness of processing to which consent was previously given. Withdrawing consent may affect access to certain features of the Company's service for which the processing of personal information is necessary.
- To request that the Company erase all of your personal information, with which the Company shall comply, unless there is a lawful reason for not doing so.

#### **Company security measures**

The Company applies all appropriate technical and administrative measures necessary to protect the personal information that it collects and processes. The measures used are designed to provide a level of security appropriate to the risk of processing personal information. In particular, the Company:

- Stores personal data on secure servers.
- Uses encrypted transmission links in cases where it is both possible and necessary.
- Uses other safeguards: firewalls, authentication systems (e.g. passwords), and access control mechanisms to prevent unauthorised access to systems and data.
- Regularly reviews information collection, storage, and processing practices, including physical security measures, to guard against unauthorised access to systems.
- Restricts access to personal information to Company employees, contractors, and agents who need to know such information in order to process it, and who are subject to strict contractual confidentiality obligations.

#### **International data transfers**

Subject to certain conditions, the Company reserves the right to transfer your personal information to third parties in other countries for further processing in accordance with the purposes set out in this Policy. In certain cases, this may include transferring data to countries

which do not offer the same level of protection as the laws of your country of residence. In such cases, the Company will, as required by applicable law, ensure that your privacy rights are adequately protected by appropriate technical, administrative, contractual, or other lawful means. These include putting data transfer agreements in place for the transmission of personal information within the group of companies to which the Company is party, which require all partners to protect the personal information they process in accordance with applicable data protection laws.

### **Data retention**

Your personal information is only retained for as long as it is necessary to carry out the purposes set out in this Policy (unless further retention is required by law).

### **Automated decision making**

In some instances, the Company's use of your personal information may result in automated decisions being taken (including profiling) that legally affect you or similarly significantly affect you.

Automated decisions mean that a decision concerning you is made automatically on the basis of a computer determination (using software algorithms), without human oversight.

When an automated decision about you is made, you have the right to contest the decision, and to demand a review of the decision by a Company employee.