

PRIVACY POLICY

Your privacy is important to us and we are committed to respect the confidentiality of information and the privacy of individuals.

This Privacy Policy provides an overview of how Exness (CY) Ltd (the "Company") processes your personal data and sets out the information that the Company must provide to you for the purpose of the EU General Data Protection Regulation ("GDPR") which is applicable as of 25 May 2018.

By accessing our Company's website including using any of the communication channels to contact us, we consider that you have read, understood and accepted the terms of this Privacy Policy and how we process any information you disclose to us. Moreover, you agree that this Policy, including any amendments will govern how we collect, store, use, share and in any other form process your personal data and your rights during our relationship and after its termination.

The information contain herein supersedes any information in relation to the processing of personal data that is included in any of the existing Notice/Privacy Agreement/Client Agreement and associated forms on matters that are covered by this Privacy Policy.

The Company may revise or update this policy from time to time. The new version of this Policy will be available on the Company's website.

Who are we?

The Company is authorised and regulated by the Cyprus Securities and Exchange Commission ("CySEC") as a Cyprus Investment Firm (CIF) to offer certain investment and ancillary services and activities (found on the Company's website and on CySEC's website at www.cysec.gov.cy) under the Investment Services and Activities and Regulated Markets Law of 2017 L.87(1)/2017, as subsequently amended from time to time ("the Law") and collects, processes and stores personal data of its actual and potential clients and website users through service offering.

Under the EU's General Data Protection Regulation (GDPR) personal data is defined as: "any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person".

How will Exness (CY) Ltd use the personal data it collects about me?

Exness (CY) Ltd will process (collect, store and use) the information you provide in a manner compatible with the EU's General Data Protection Regulation. We will endeavour to keep your information accurate and up to date, and not keep it for longer than is necessary. The Company is required to retain information in accordance with the law, such as information needed for income tax and audit purposes. How long certain kinds of personal data should be kept may also be governed by specific business-sector requirements and agreed practices. Personal data may be held in addition to these periods depending on individual business needs.

Why does Exness (CY) Ltd need to collect and store personal data?

In order for us to provide you with our products and services we need to collect personal data from you. In any event, we are committed to ensuring that the information we collect and use is appropriate for this purpose, and does not constitute an invasion of your privacy.

In terms of being contacted for marketing purposes, Exness (CY) Ltd would contact you for additional consent.

What kind of personal information do we collect

We may collect and use different types of information about you that can be grouped together as following:

Type of Personal Data	Description & examples
Contact	Your name, where you live, how to contact you, including telephone number, email and home address
Documentary Data	Information about you that are stored in different documents in various forms or copies of them, including things like your passport, identity card, driver license as well as documents for the proof of you address, payslip/tax return as proof of source of funds, corporate documents of your entity, trust deeds, Power of attorney, credit checks and appropriateness tests

Personal specific-data	Gender, date of birth
Financial	Your assets, income, financial position/source of wealth, employment details such as occupation, industry and name of employer, status and history
Socio-Demographic	Your education, profession and/or details about your work, nationality
Contractual	Details about the services and or products offering
Trading/Transactional information	Knowledge and experience in trading, risk tolerance and risk profile bank account, e-wallet and credit card details
National identifier	Tax identification number, country of tax residence
Location	IP address and country by phone number you provided
Communication & correspondence	Details about you from letter, email and conversation, chats between us
Public Records and Open Sources	Details about you that are available online, are in public records or other open available sources
Consent/permission	Your consents, any permission or preferences given to the Company
Behavioral	Historical data about the trades and investments you have made, your preference for certain type of products and services, products you trade with us
Technical	Details of the device and technology you use

We obtain this information in a number of ways through your use of our services and website and app, the account opening applications, our demo sign up forms, and from information provided in the course of ongoing customer service correspondence.

We may also collect this information about you from third parties either through bought-in third party marketing lists, publicly available sources, social media platform, introducers brokers and affiliates, bankers and credit card processors, subscription-based intelligence databases, credit references agencies, fraud prevention agencies, third authentication service providers, other financial institutions and the providers of registers, and other third party associates.

We may ask for other personal information from time to time (for example, through market research, surveys or special offers). If you choose not to provide the information we need to fulfil your request for a specific product or service, we may not be able to provide you with the requested product or service.

We also use cookies on our website or our apps to ensure that our website works effectively, for fraud prevention, security and to support your trading activities. Cookies are small text files sent from our web server to your computer.

We may enlist outside organisations to help us manage the website and collect and analyses statistical data. These outside organizations may install and use their own cookies on our behalf.

We may 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 business relationship with you. These recording will be our sole property and will constitute evidence of the communications between us for the purpose of complying with our regulatory obligations. Such telephone conversation may be recorded without a prior warning tone or any other further notice.

We collect, use, disclose, transfer and store data when needed to provide our services and for our operational and business purposes as stated herein. We want to be clear about our privacy practices so you can make informed choices about the use of your personal data. You can contact us at any time with questions or concerns.

Further, if you visit any of our offices or premises, we may have CCTV which will records your image, for security reasons

The personal data we collect will be used for the following **purposes**:

- To review your registration for the Company services and products
- To Register Personal Areas, open and configure trading accounts, and issue activation codes and passwords
- To provide secure high-quality services and products
- To manage fees and charges and collect and recover money due to the Company

- To improve our products and services, including customer services and develop and market new products and services and promptly communicate to you the availability of additional services, features, and promotions we may be offering
- To maintain various reports, registers, relating to our legal obligations imposed by relevant laws to which we are subject, as well as specific statutory requirements (ie, anti-money laundering laws, financial services laws, corporation laws, privacy law and tax laws) - we do so not only to comply with our legal obligations but because it may also be in our legitimate interest to do so
- To manage risk for the Company and the Company's clients
- To investigate or settle enquires or disputes or respond to complains- we may need to use your information in such cases as it is in our legitimate interests to ensure that disputes or issues are investigated and resolved quickly and in an efficient manner
- To comply with applicable law, court order, 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 legitimate interest to do so.
- To develop and carry out marketing activities
- To study how the customers, use products and services from the Company
- To exercise the Company's rights set out in the agreements or contracts
- To run the Company's business in an efficient and proper way including to manage our financial position, planning, communication, corporate governance, audit
- To develop and manage the Company's intellectual property rights, services and products
- To test new products/ services
- To manage how the Company works with other companies that provides services to the Company and/or the Company's customers

When and how do we obtain your consent

We may process your personal data for one or more lawful bases of processing (the "lawful basis") depending on the specific purpose for which we are using your data.

Our **lawful basis** for processing for the personal data are the following:

- Fulfilling contractual obligations
- Company's legal and regulatory obligations
- Company's legitimate interest- the processing may be necessary for the purposes of the legitimate interests pursued by us (subject to the relevant individual's fundamental rights and freedom overriding such interests)

By consenting to this Privacy Policy, you are giving us permission to process your personal data specifically for the purposes identified. Where we are asking you for

sensitive personal data we will always tell you why and how the information will be used.

Where our use of your personal information does not fall under one of the three Lawful bases above we require your consent. Such consent shall be freely given by you and you have the right to withdraw your consent at any time by contacting us using the contact details set out in this Privacy Policy.

Who may we disclose personal information to?

Generally, we require that organisations outside the Exness Group who handle or obtain personal information acknowledge the confidentiality of this information, undertake to respect any individual's right to privacy and comply with the all relevant data protection laws and this privacy notice.

We may pass your personal data on to third-party service providers contracted to Exness (CY) Ltd in the course of dealing with you. We endeavor to disclose to these third parties only the minimum personal data that is required to perform their contractual obligations to us.

Any third parties that we may share your data with are obliged to keep your details securely, and to use them only to fulfil the service they provide you on our behalf. When they no longer need your data to fulfil this service, they will dispose of the details in line with Exness (CY) Ltd procedures. If we wish to pass your sensitive personal data onto a third party we will only do so once we have obtained your consent, unless we are legally required to do otherwise.

The following third parties will receive your personal data for the purpose (s) set above as part of their processing activities:

- Other Companies within the Exness Group of Companies who provide financial or support and other services
- Service providers and specialist advisers who have been contacted to provided us with administrative, IT, analytics, online marketing optimization, financial, regulatory, compliance, insurance, research or other services
- Third party providers when you use our apps, communication systems and trading platforms, SMS gateways which are provided to us by third parties
- Payment service providers and banks processing your transactions
- Auditor or contractors or other advisers auditing, assisting with or advising on any of our business purposes
- Courts, tribunals and applicable regulatory authorities as agreed or authorized by law or our agreement with you
- Government bodies and law enforcement agencies when required by law and in response to other legal and regulatory requests

- Any third party where such disclosure is required in order to enforce or apply our Terms of Business or other relevant agreements
- Successor or assignees or transferees or buyers
- Anyone authorized by you.

Please note that the use of your personal information by external third parties who act as data controllers of your personal information is not covered by this privacy policy and is not subject to our privacy standards and procedures.

Moreover, our websites or our apps may have links to external third-party websites. Please note, however, that third party websites are not covered by this privacy policy and those sites are not subject to our privacy standards and procedures. Please check with each third party as to their privacy practices and procedures.

Further, we may transfer your personal information outside the European Economic Area to other entities part of our Group as well as service providers (processors) who are engaged on our behalf. For example, your personal information may be processed by staff in the Exness Group of Companies operating outside the EEA who work for us, another Exness Group entity or for one of our service providers. Such member of the staff may be, among others, engaged in the fulfilment of your requests, the processing of your payment details and the provision of support services. To the extent we transfer your information outside the European Economic Area, we will ensure that the transfer is lawful and that there are appropriate security arrangements. Moreover, we will ensure that the processors in third countries are obliged to comply with the European Data Protection Laws or other countries' laws which are comparable and to provide appropriate safeguards in relation to the transfer of your data in accordance with the provision of the GDPR (art 46).

Where we make transfers to Third party in the US, we may in some cases rely on applicable standard contractual clauses, binding corporate rules, the EU-US Privacy Shield or any other equivalent applicable arrangements.

The Company will take all steps reasonable necessary to ensure that your data is treated securely and in accordance with this Privacy Policy. If you would like a copy of such arrangements, please contact us in writing using the contact details provided at the end of this policy.

How do we store personal information and for how long?

Exness (CY) Ltd will process personal data for as long as we have a business relationship with you, in a combination of secure computer storage facilities and paper-based files and other records and we take the necessary measures to protect the personal information we hold about you from misuse, loss, unauthorized access, modification or disclosure.

When we consider that personal information is no longer needed for the purpose for which it was collected, we will remove any details that will identify you or we will securely destroy the records. However, we may need to maintain records for a significant period of time (after you cease to be our client) subject to certain AML laws that require us to retain a copy of the documents we used in order to comply with our customer due diligence obligations as well as supporting evidence and records of transactions with you and your relationship with us, for a period of five (5) years after our business relationship with you has ended.

For the personal information held in the form of an email, telephone, electronic, in person or otherwise recorded communication, the information will be retained in line with the requirements of our Regulatory Authority (ie, five (5) years after our business relationship with you has ended or longer if we have legitimate interests (such as handling a dispute with you).

If 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.

We may keep your data for longer than 5 years if for legal, regulatory or technical reasons we cannot delete it.

Your rights as a data subject

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- Right of access – you have the right to request a copy of the information that we hold about you.
- Right of rectification – you have a right to correct data that we hold about you that is inaccurate or incomplete.
- Right to be forgotten – in certain circumstances you can ask for the data we hold about you to be erased from our records.
- Right to restriction of processing – where certain conditions apply to have a right to restrict the processing.
- Right of portability – you have the right to have the data we hold about you transferred to another organisation.
- Right to object – you have the right to object to certain types of processing such as direct marketing.
- Right to object to automated processing, including profiling – you also have the right to be subject to the legal effects of automated processing or profiling.
- Right to judicial review: in the event that the Company refuses your request under rights of access, we will provide you with a reason as to why. You have the right to complain as outlined in the paragraph last written below.

Under what circumstances will Exness contact me?

Our aim is not to be intrusive, and we undertake not to ask irrelevant or unnecessary questions. Moreover, the information you provide will be subject to rigorous measures and procedures to minimize the risk of unauthorized access or disclosure.

Can I find out the personal data that the organisation holds about me?

Exness (CY) Ltd at your request, can confirm what information we hold about you and how it is processed. If Exness (CY) Ltd does hold personal data about you, you can request the following information:

- Identity and the contact details of the person or organisation that has determined how and why to process your data. In some cases, this will be a representative in the EU.
- Contact details of the data protection officer, where applicable.
- The purpose of the processing as well as the legal basis for processing.
- If the processing is based on the legitimate interests of Exness (CY) Ltd or a third party, information about those interests.
- The categories of personal data collected, stored and processed.
- Recipient(s) or categories of recipients that the data is/will be disclosed to.
- If we intend to transfer the personal data to a third country or international organisation, information about how we ensure this is done securely. The EU has approved sending personal data to some countries because they meet a minimum standard of data protection. In other cases, we will ensure there are specific measures in place to secure your information.
- How long the data will be stored.
- Details of your rights to correct, erase, restrict or object to such processing.
- Information about your right to withdraw consent at any time.
- How to lodge a complaint with the supervisory authority.
- Whether the provision of personal data is a statutory or contractual requirement, or a requirement necessary to enter into a contract, as well as whether you are obliged to provide the personal data and the possible consequences of failing to provide such data.
- The source of personal data if it wasn't collected directly from you.
- Any details and information of automated decision making, such as profiling, and any meaningful information about the logic involved, as well as the significance and expected consequences of such processing.

Contacting us about this Policy or making a complaint

If you have any queries about the content of this Privacy Policy, or wish to inform us of a change or correction to your personal data, would like a copy of the data we collect on you or would like to raise a complaint or comment, please contact us using the details set out below.

Email: dataprotection@exness.eu

Tel: 25 245 730

Address: 1 Siafi Street, Business Center, Office 401, 3042, Limassol, Cyprus

If you are not satisfied with our response to your complaint, you have the right to lodge a complaint directly with our supervisory authority, the Office of the Commissioner for Personal Data Protection (the "Commissioner") details below:

Address: 1 Iasonos str., 1082 Nicosia

P.O.Box 23378, 1682 Nicosia,

Tel: +357 22818456

Fax: +357 22304565

Email: commissioner@dataprotection.gov.cy

Further information is available on the Commissioner website at <http://www.dataprotection.gov.cy>