

1. About TheGlobalFX Ltd

TheGlobalFX Ltd is incorporated in Seychelles under registration number 9563152-1. Our office is located at SN Complex, Office 1C, 1st Floor, Providence, Mahe, Seychelles. TheGlobalFX Group encompasses all direct or indirect subsidiaries and parent undertakings.

As the ‘controller’ of your personal data, TheGlobalFX determines the purposes and means of processing your personal information as outlined in our Privacy Policy (referred to as the “Policy”).

2. Our Commitment to Privacy

At TheGlobalFX Ltd, we hold your privacy in the highest regard. Safeguarding the confidentiality of your information, protecting your privacy, and upholding your rights are our foremost priorities. When you entrust us with your information, we are committed to maintaining its privacy and security.

We have implemented all necessary technical and organizational measures to ensure the confidentiality, security, and integrity of your personal information. Our practices align with relevant statutory data protection requirements, including those outlined in the Financial Consumer Protection Act, 2022 (“FCPA”).

3. Purpose of This Policy

This Policy explains how TheGlobalFX Ltd processes personal data collected through its website (www.theglobalfx.com), app, and social media platforms. It covers the collection, use, and protection of personal data, including information gathered from third parties. This Policy applies to clients, potential clients, website and app users, and visitors. Our services are not intended for individuals under 18 years old. For inquiries or to exercise your data rights, contact our Data Protection Officer:

- **Entity:** TheGlobalFX Ltd
- **Contact Person:** Data Protection Officer
- **Email:** support@theglobalfx.com
- **Address:** SN Complex, Office 1C, 1st Floor, Providence, Mahe, Seychelles.

4. Amendments

TheGlobalFX Ltd reserves the right to amend this document periodically. We recommend reviewing this statement regularly to stay informed about how we process and protect your personal data. If you have any concerns, please contact our Data Protection Officer (DPO) at support@theglobalfx.com.

5. What Personal Data We Collect and How

1. Information You Provide:

- When you fill in forms, correspond with us, or respond to surveys.
- During registration on the TheGlobalFX App, account opening, or service usage under the Client Agreement.
- Participation in online discussions, promotions, or contact with customer support.
- Sharing information on Social Networks or accessing the TheGlobalFX feed.

Details collected include:

- Personal details like name, address, nationality, and ID/passport numbers.
 - Contact information such as phone numbers and email addresses.
 - Financial details, employment status, and income sources.
 - Device information and preferences.
- ### 2. Data from Product Usage:
- Technical information (IP address, device type, browser details).
 - Website/app usage data (pages visited, links clicked, and interaction details).
- ### 3. Social Networks and TheGlobalFX's Social Feed:
- Aggregated statistics and demographic information provided by Social Networks.
 - Usage profiles for market research and advertising purposes based on your interests.
- ### 4. Location Information:
- Tracked via IP address.
- ### 5. Third-Party and Publicly Available Data:
- Information from financial institutions, registers, and fraud prevention agencies.
 - Publicly available data for enhanced due diligence and KYC checks.
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6. Disclosure of Your Personal Data

TheGlobalFX may share your personal data for various purposes related to transaction processing, account services, and to fulfill our legal obligations, particularly concerning suspected breaches of anti-money laundering regulations, with any entity within TheGlobalFX Group. This includes sharing data and documents collected by TheGlobalFX for identification purposes.

Additionally, TheGlobalFX may share your personal data with the following types of service providers and entities:

- **IT and payment service providers:** To facilitate service delivery.
- **Trading platform providers:** To enable trading services.
- **EMIs, banks, and payment institutions:** For asset safeguarding and transaction execution.
- **Administrative systems providers:** Including KYC onboarding, translation, due diligence, and risk analysis.

- **Internal auditors:** To ensure compliance with legal obligations.
- **Analytics and information providers:** To improve website and app functionality.
- **Customer-service providers, survey providers, developers:** To enhance service delivery.
- **Communication services providers:** For sending emails, push notifications, and messages.
- **Data storage providers:** For secure data storage.

We may also disclose your personal data to government authorities, law enforcement agencies, tax authorities, and fraud prevention agencies for identity verification, fraud prevention, tax compliance, and to ensure eligibility for our services. If fraud is detected, service may be refused by TheGlobalFX or other entities within TheGlobalFX Group.

Furthermore, we may share your personal data with third-party organizations or authorities for legal reasons, such as compliance with laws and regulations, business sales, fraud investigations, enforcing rights, legal claims, and court orders.

If you direct us to share your personal data with a third party, we will do so upon valid authorization, which may require written proof of authorization.

For further details on data sharing, please refer to TheGlobalFX's Privacy Policy.

7. How We Use Your Personal Data

A. Providing Our Services When you sign up with TheGlobalFX, apply for a product or service, or use our services, we use your personal data to:

- Verify your identity as part of our KYC process.
- Assess and approve your application.
- Fulfill contractual and legal obligations related to your transactions and account activities.
- Maintain your personal profile.
- Monitor your trading activity for quality and compliance purposes.
- Evaluate your financial knowledge and investment preferences to tailor our services to you.
- Inform you about changes to our products or services and maintain communication records.

B. Legal Obligations We store and process personal data to comply with laws and regulations, including anti-money laundering, financial services, corporation, privacy, and taxation laws. This includes record-keeping requirements and responding to legal and regulatory authorities.

C. Protecting Against Fraud We use your personal data to verify your identity, prevent fraud, and manage risks associated with your account and financial circumstances.

D. Marketing and Providing Relevant Products and Services We may use your personal data to:

- Personalize your experience and tailor marketing messages about our products and services.
- Provide information about promotions or offers from partners that may interest you.
- Measure marketing effectiveness and deliver relevant advertising.
- Seek your feedback to improve our products and services.

E. Keeping Our Services Operational Your personal data helps us manage and improve our website and app, troubleshoot issues, analyze data, and ensure security.

F. Location-Based Monitoring We use your personal data to prevent illegal trading activities and protect against fraud while using TheGlobalFX services.

G. Preparing Anonymous Statistical Datasets We compile anonymous statistical datasets to:

- Forecast trends.
- Understand client usage patterns.
- Comply with governmental reporting requirements. These datasets do not contain personal data and are used for analysis within TheGlobalFX or shared externally in aggregated form.

H. Improving Products and Services We may request your feedback through surveys to enhance our services based on your responses.

I. Meeting Legal Obligations, Enforcing Rights and Other Legal Uses your personal data is used to:

- Share with government authorities, law enforcement agencies, and regulators.
- Inform you about changes to services or laws.
- Manage operational risks and optimize Group operations.
- Meet legal and regulatory obligations and handle legal claims.

8. Technical and Operational Security Measures

At TheGlobalFX, we employ stringent controls and security practices to uphold high standards of information security and comply with relevant provisions, including the FCPA. Our administrative, physical, and technical safeguards are designed and maintained to protect your personal data from accidental or unlawful destruction, loss, alteration, unauthorized disclosure, or access during its transmission, storage, or processing.

Access to personal data is restricted to authorized personnel who require it to fulfill their duties and to serve the legitimate purposes for which the data is processed by TheGlobalFX.

Data Protection Impact Assessment (DPIA)

We conduct a DPIA for operations that may pose a high risk to the rights and freedoms of data subjects, especially when utilizing new technologies. This assessment precedes any processing

activities, ensuring compliance with data protection regulations. It considers the nature, scope, context, and purposes of the processing.

Protecting Your Account

For your security, please refrain from sharing your login details with any third party.

For more information on these security measures, you may contact our Data Protection Officer (DPO) at support@theglobalfx.com. Specific details are subject to the DPO's discretion.

09. Communication

At TheGlobalFX, we record, monitor, and process all telephone conversations and electronic communications you have with us, whether via phone, email, Social Networks, or electronic messages. This includes conversations and communications that may involve transactions or client order services, even if they do not result in final transactions. All incoming and outgoing telephone conversations and other electronic communications between you and TheGlobalFX are recorded and stored for purposes of quality monitoring, training, and regulatory compliance.

For in-person conversations or communications, relevant details may be recorded by minutes or notes. Upon request, we can provide you with records in the same language used to provide our services to you.

10. Storage and Retention of Your Personal Data

At TheGlobalFX, we prioritize the security of your personal information. Your data is retained on secure servers, and stringent procedures and measures are in place to safeguard it. We maintain your personal information throughout our business relationship with you and as allowed by applicable laws and regulations. The retention period aligns with the purposes for which the data was collected and to comply with legal, regulatory, accounting, taxation, or reporting requirements, as specified by the FCPA.

When personal information is no longer necessary for its original purpose, we anonymize it or securely destroy it. Certain laws, such as anti-money laundering and taxation regulations, mandate that we retain specific data for up to seven (7) years after our business relationship concludes. This includes documents used for customer due diligence, transaction records, and communication logs.

Additionally, recorded communications, whether by telephone, electronic means, or in person, are retained according to local regulatory requirements. This retention ensures compliance and supports our business interests, such as managing disputes.

In cases involving potential or ongoing legal claims or other legal obligations, we may retain your personal data for a longer period.

11. What Are Your Rights?

You have the following rights which you can exercise freely and at your own discretion:

- **Request to Review Your Personal Information:** You can request to review the personal information we hold about you.
- **Request Correction of Your Personal Information:** If you believe any of the personal information we hold about you is incomplete or inaccurate, you can request correction. We may need to verify the accuracy of the new data you provide before making changes.

To exercise any of these rights, please email your request to the DPO of TheGlobalFX at support@theglobalfx.com. Your request will be promptly addressed.

Please note the following:

- No Fee Usually Required:** There is usually no fee required to exercise your rights. However, if your request is unfounded, repetitive, or excessive, we may charge a reasonable fee or refuse to comply.
- Identity Verification:** We may request specific information to confirm your identity, expedite our response, and ensure your right to access your personal data.
- Timely Response:** We will respond to your request within a reasonable timeframe and keep you informed throughout the process.

12. Personal Data Breach

We have established procedures to address any breaches of personal data. We will notify you and any relevant regulator of a breach where legally required.

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