

PRIVACY POLICY

01 February 2022

This Privacy Policy outlines how your personal data will be processed in the course and/in connection with your participation (applying for participation) in Currency.com Introducing Broker Program.

As an administrator of Currency.com Introducing Brokers Program, CURRENCY DOT COM UK LIMITED, a private limited company registered under the laws of England and Wales with company number 11472695, having its registered office at c/o Fladgate LLP, 16 Great Queen Street, London, England, WC2B 5DG, United Kingdom ("Administrator", "We" or "Us") will process your personal data being responsible for the protection of privacy and the safeguarding of your personal data.

For the purposes of this Privacy Policy Currency.com shall mean CURRENCY COM GLOBAL LLC, a limited liability company registered in Saint Vincent and the Grenadines, with registration number 1291 LLC 2021, having its registered office at First Floor, First St. Vincent Bank Ltd. Building, James Street, Kingstown, Saint Vincent and the Grenadines.

1. Consent

Whenever we collect and process your personal data, we do this as a data controller and with your explicit consent and for legitimate purposes. In some cases, we may be considered to act as a joint controller with Currency.com.

BY ACCEPTING THIS PRIVACY POLICY, YOU HAVE GIVEN US AN EXPLICIT CONSENT FOR PROCESSING YOUR PERSONAL DATA AS DETERMINED IN THIS PRIVACY POLICY.

After conclusion of the Introducing Broker Agreement, this Privacy Policy shall be an integral part of such Agreement.

2. Collection & Usage of Personal Information

We may collect various types of personal data about you, including:

- (i) contact and identity data (e.g., full name or its parts, marital status, date and place of birth, nationality, gender, information from your identity document(s), your pictures / pictures of your identity, billing address, residential address, email address and telephone number);
- (ii) your function (e.g., title, position and name of company);
- (iii) social and financial data (e.g., bank account and payment card details, trading account details, tax identification number, virtual currency wallet address(es), details about payments to and from you related to your participation in Introducing Broker Program);
- (iv) your electronic identification (tracking) data where required for anti-fraud reasons or for the other legitimate purpose (e.g., login, passwords, picture, Device ID, IP address, online identifiers/cookies, logs); and
- (v) communication recording (recordings of emails, chats, phone calls).

We may also collect certain demographic information, including education, occupation, etc. We neither collect nor process any sensitive data, including data concerning racial or ethnic origin, political convictions, religious or philosophical beliefs, participation in associations or trade unions, health, personal life, as well as data relevant to criminal prosecutions or convictions.

We may collect information in a form that does not, on its own, allow to identify any specific individual (i.e., not personally identifiable information), including such information as language, zip code, area code, location, and the time zone. We may collect, use, transfer, and disclose such not personally identifiable information for whatever legal purpose this information may serve as long as it is not traceable to the original owner and therefore not categorised as personal data.

We may collect the necessary personal data for any legitimate purpose related to our business relations according to the Introducing Broker Agreement. We always process your personal data for a specific purpose and only process the personal data which is relevant to achieve that purpose.

We will only process your personal data if:

- (i) we have obtained your prior consent;
- (ii) the processing is necessary to perform our contractual obligations towards you or to take pre-contractual step (e.g., considering your application for participation in Introducing Broker Program);
- (iii) the processing is necessary to comply with our legal or regulatory obligations and/or legal or regulatory obligations of the Group; or
- (iv) the processing is necessary for our legitimate interests and does not unduly affect your interests or fundamental rights and freedoms.

We also collect the necessary information to ensure our compliance with the applicable laws and regulations.

3. Protection of Personal Information

Any personal information provided by you to the Administrator will be treated as confidential and shared only within the Group and will only be disclosed to a third party taking in account the principle of data minimisation (only the necessary info) or under any regulatory or legal proceedings. In case such disclosure is required to be made by law and/or any regulatory authority, it will be made on a 'need-to-know' basis, unless otherwise instructed by the law and/or regulatory authority. Under such circumstances, the Administrator will expressly inform the third party of the confidential nature of the information. For the purposes of this Privacy Policy term "Group" shall mean collectively, the Administrator, Currency.com and (a) any entity controlled, directly or indirectly, by the Administrator or Currency.com; (b) any entity that controls the Administrator or Currency.com, directly or indirectly; or (c) any entity, directly or indirectly, under common control with the Administrator or Currency.com, where "control" of any entity means ownership of 20% or more of voting rights of such entity.

4. Group, Partners and Non-Affiliated Third Parties

We may share information within the Group, partners and non-affiliated third parties in the event such information is reasonably required by the relevant party for purposes related to the Introducing Broker Program. In case any information is shared we will do so in full compliance with the applicable data protection regulations.

Your personal information may be passed on to the Group, our partners or non-affiliated third parties particularly where

- (i) required by law or obligatory (e.g., within the scope of a tax audit by the tax authorities or as part of efforts to prevent money laundering);
- (ii) it may be necessary to pass on your personal information in order to protect your interests or our interests or to fulfil our contractual obligations;
- (iii) we integrate external service providers into our internal processes.

Your personal data can be accessed by or transferred particularly to the following categories of recipients:

- (i) our personnel (including personnel, departments or other companies of the Group);
- (ii) our independent agents;
- (iii) our other suppliers and services providers that provide services and products to us (e.g., payment service providers, banks, customer support and marketing services providers);
- (iv) our IT systems providers, cloud service providers, database providers and consultants;
- (v) any third party to whom we assign or novate any of our rights or obligations.

All the mentioned parties only get the minimum amount of personal data they need for their specific purposes related to the Introducing Broker Program.

All the parties with which the Administrator shares personal information are required to protect such personal information in accordance with all relevant laws & regulations and in a manner similar to the way the Administrator protects the same. The Administrator will not share personal information with third parties which are considered as not being able to secure the required level of protection.

The personal data we collect from you may be processed, accessed or stored in a country outside the UK, which may not offer the same level of protection of personal data.

If we transfer your personal data to external companies in other jurisdictions, we will make sure to protect your personal data by

- (i) applying the level of protection required under the local data protection/privacy laws applicable to the UK,
- (ii) acting in accordance with our policies and standards and,
- (iii) only transferring your personal data on the basis of standard contractual clauses approved by the European Commission - for subjects located in the European Economic Area, unless otherwise specified.

5. Contacting

From time to time the Administrator may contact you by email or other applicable means of communication and we may keep a record of such communications for lawful and legitimate business purposes. The relevant records will be our sole property and you accept that they will constitute evidence of the communications between us and will be kept for as long as necessary to reach the purposes they were initially made for.

6. Storage

We store the gathered personal information for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, accounting or reporting requirements relating to the Administrator and/or Currency.com. We may retain your personal data for a longer period in the event of a complaint or if we reasonably believe there is a prospect of litigation in respect to our relationship with you.

To determine the appropriate retention period for personal data, we consider the amount, nature and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal, regulatory, tax, accounting or other requirements.

In some circumstances you can ask us to delete your data – please see section 7 below for further information about this.

In some circumstances we can anonymise your personal data (so that it can no longer be associated with you) for research or statistical purposes, in which case we may use this information indefinitely without further notice to you.

7. Your Rights

You have a number of legal rights in relation to the personal data that we hold about you. These rights include:

- (1) the right to unconditionally withdraw your consent to the collection, processing, storage and use of personal information by the Administrator at any time. You are also allowed to partially give consent to specific collection, processing and storage of personal data. However, please note that we may still be entitled to process your personal data if we have another legitimate reason (other than consent) for doing so;
- (2) the right to request that we erase your personal data in certain circumstances. However, please note that there may be circumstances in which you ask us to erase your personal data, but we are legally entitled to retain it;
- (3) the right to rectify your personal details on your request;
- (4) the right to object to processing after giving us consent to collect, process and store your personal data. This may result in ending the business relationship with us. Again, there may be circumstances where you object to, or ask us to restrict, our processing of your personal data but we are legally entitled to either continue processing your personal data and / or to refuse that request;
- (5) the right to know about own personal information collected, how it's used and shared as well as obtain information regarding the processing of your personal data and access to the personal data which we hold about you;
- (6) in some circumstances, the right to receive some personal data in a structured, commonly used and machine-readable format and/or request that we transmit those data to a third party where this is technically feasible. Please note that this right only applies to personal data which you have provided to us;

- (7) the right to non-discrimination for exercising personal data protection rights;
- (8) the right to lodge a complaint with the data protection regulator (Information Commissioner's Office: <https://ico.org.uk>) or another relevant jurisdiction regulator in accordance with the data protection applicable regulations, if you think that any of your rights have been infringed by us.

If you wish to exercise any of the rights set out above, please contact us at privacy@currency.com.

8. Privacy Policy Updates and Contact

We may update this Privacy Policy from time to time. In the event we materially change this Privacy Policy including how we collect, process or use personal information, Introducing Brokers will be notified by email and/or via Platform (IB Section). Potential Introducing Brokers and other relevant subjects are notified by means of the publication of the updated Privacy Policy on the website.

We encourage you to periodically review this Privacy Policy so that you are always aware of what information the Administrator collects, how it uses it and to whom it may disclose it, in accordance with the provisions of this Privacy Policy.

Should you have any further questions in relation to the processing of your personal data, we invite you to contact privacy@currency.com.