

# Privacy Policy

At FOREXDANA we are committed to your privacy. In this Privacy Policy we explain how FOREXDANA collects, stores, uses and shares your personal information.

Personal information is information about an identifiable individual. It includes information that could be used to identify you, such as your name and contact details.

This Privacy Policy applies to all products and services made available by FOREXDANA International Limited (Company Number 11576303). By using any of these products and services you are permitting us to collect, store, use and share your personal information in accordance with this Privacy Policy.

## SUMMARY OF HOW WE MANAGE YOUR PERSONAL INFORMATION

**1. Collection:** We collect the personal information you provide to us either directly or from your computer, mobile or other device. We may also collect your personal information from a range of third parties, including service providers. If you choose not to provide the personal information we request, then we may not be able to offer our products and services to you.

**2. Use and Disclosure:** We use your personal information for a range of purposes including for the provision of our products and services, to better understand your preferences and to conduct and develop our business. Where authorised, we may share your personal information with governmental and law enforcement agencies and third party service providers.

**3. Storage:** If we collect personal information about you, we will store it in secure data storage facilities. **Access & Complaints:** You have rights under the Privacy Act to request access to and correct your personal information.

## 1. COLLECTION OF YOUR PERSONAL INFORMATION

Most of your personal information that we collect will come directly from you when you deal with FOREXDANA either in person, remotely or in writing. The type of information we collect will depend on the product or service in question and may include:

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- your identification and contact details, including your name, email address, phone number, physical address, specimen signature and date of birth;
- information collected in relation to your derivative trading including your user name and login credentials, activity logs, IP address, device, browser and operating system identifiers;
- your employment details, financial position, source of funds, previous experience in trading, and other information you provide to allow us to assess your suitability for our products and services;

- your employment details, financial position, source of funds, previous experience in trading, and trading with FOREXDANA;
- your queries, complaints and other written or verbal communications with us. When you're dealing with any member of FOREXDANA by telephone or live web or video chat service, your conversation may be recorded for training or verification purposes; and any other information that FOREXDANA is required by law to collect about you. We may also collect your personal information from third parties, including:
  - where that information has been made publicly available, social media platforms and public information service providers such as public registers (this information may be used to supplement our customer databases and for marketing and business development purposes);
  - commercial information service providers such as market researchers, data and/or analytics providers and advertising networks; and your representatives, such as your legal or financial adviser.

## 2. USING AND SHARING YOUR PERSONAL INFORMATION –PURPOSES

For the purposes set out below at 2.1-2.4, FOREXDANA may use and share your personal information with your representatives; authorities such as regulators, government agencies, courts or the Police; fraud bureaus, credit reference and debt recovery agencies; external dispute resolution schemes; brokers and referrers; anyone in connection with a reorganisation, sale or acquisition of any FOREXDANA business; payments systems operators; other financial institutions with which FOREXDANA has joint marketing arrangements; any related corporate body of FOREXDANA; and third parties such as our service providers, suppliers and certain sub-contractors.

2.1 To provide our products and services and administer our relationship with you

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- to assess whether to give you a particular product or service, including by confirming your identity, residence, employment and financial status, to assess your suitability for our products and services, and to make all necessary enquiries about any information you have given us in relation to any product or service that we are providing;
- to determine our hedging position from time to time and in particular whether we will take the market risk in trades with you (if we do, we will make money when a trade goes against you and lose money when a trade is in your favour)
- to provide our products and services to you, including communicating with you throughout the life of your relationship with FOREXDANA about any changes to our products and services;
- to provide customer support, including contacting you to offer assistance with online applications (including those you do not complete);

- improve, optimise and personalise your experience of our products and services; and if you are a joint account holder, to enable FOREXDANA to share your personal information relating to your joint account with the other joint account holder(s)

## 2.2 To comply with laws and regulations

- to enable FOREXDANA to comply with any United Kingdom or overseas laws, rules or regulations, including any future laws (including to enable the government of United Kingdom or a United Kingdom governmental agency or regulator to comply with any agreement between it and an overseas government, agency, or regulator);
- to share personal information with the police, government agencies, or regulators in United Kingdom or overseas, where FOREXDANA reasonably believes that the disclosure will assist it to comply with any United Kingdom or overseas laws, rules or regulations or will assist in the investigation, detection and/or prevention of fraud, money laundering or other criminal offences; and to meet our regulatory requirements under our Derivatives Issuer License and as may be required from time to time under the Financial Markets Conduct Act 2013 or any other law we share personal information with Financial Markets Authority (FMA) when they require us to do so (or whether otherwise necessary or desirable for our dealings with the FMA).

## 2.3 To research and market products and services

- to conduct market research and analysis about our brand, offers, FOREXDANA products or services either ourselves or using service providers, both while you are a customer and for a reasonable time afterwards; and unless you ask us not to, to make available and send you information about the full range of offers, products and services offered by FOREXDANA, including to:
  - enable selected third parties to present you with offers, advertisements and/or products or services that we believe may be of interest to you; and
  - provide you with information about events, appeals and organisations sponsored by FOREXDANA. We may contact you by various means, including mail, telephone, email, SMS/text message

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and through our trading platform. You can ask us not to use your personal information for marketing purposes by contacting us via email or phone. You can also unsubscribe from electronic messages received from us by following the instructions provided in the message.

## 2.4 Other

In addition to the purposes set out above, FOREXDANA may also share your personal information with third parties (subject to appropriate confidentiality obligations) where you have consented to that information being shared or the reason for doing so is connected to the purpose of collecting the personal information.

## 3. STORAGE OF YOUR PERSONAL INFORMATION

Your personal information will be stored electronically in secure data centres located in United Kingdom or overseas. We use a range of physical and electronic data security measures to protect information from loss and unauthorised use, access, modification or disclosure. For example:

- access to information systems is controlled through identity and access management;
- employees are bound by information security policies and are required to keep information secure; and
- we regularly monitor and review our compliance (and our service providers' compliance) with internal policies and industry best practice. Personal information collected through use of our online trading platform is passed through a secure server using encryption technology to help keep this information protected when sent over the internet. Further, all stored personal information is protected from unauthorised access through the use of recognised security procedures such as passwords, PINs and biometric-based forms of access.

#### 4. ACCESSING AND CORRECTING YOUR PERSONAL INFORMATION

It's important that the personal information we hold about you is accurate. You are responsible for promptly informing FOREXDANA of any change of your personal details (including your name, address, telephone, mobile and email address). You can contact us to request access, or that corrections are made, to the personal information we hold about you. A reasonable fee may be charged to process your request, covering activities such as locating, collating and supplying the information to you.

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Under the Privacy Act, in some circumstances we do not have to give you access to or correct your personal information. If that is the case, we will explain why and provide information about how you can complain should you wish to do so.

#### 5. RESOLVING YOUR PRIVACY CONCERNS AND COMPLAINTS –YOUR RIGHTS

Your satisfaction is our priority so if you have a concern or complaint, please let us know and we'll do our best to resolve it right away. If you're unhappy with our response, you may wish to contact the Privacy Commissioner at: <https://privacy.org.uk>.

#### 6. HOW TO CONTACT US

By phone on +44 121 288 1568

By email on [info@forexdana.com](mailto:info@forexdana.com)

In writing to the ForexDana Compliance Officer, Fifth Floor, 3 Gower Street, London, United Kingdom, WC1E 6HA

In person at Fifth Floor, 3 Gower Street, London, United Kingdom, WC1E 6HA

## 7. CHANGES TO THIS PRIVACY POLICY

From time to time we may make changes to this Privacy Policy, for example, to record any changes to the way we handle personal information or the functionality of our products and services. Notice of any changes will be given at least 14 days in advance, by posting the updated Privacy Policy on our website. You will be required to confirm your acceptance of the updated Privacy Policy in order to continue using our products and services.

## 8. APPLICABLE LAW

This Privacy Policy is governed by United Kingdom law. Your personal information will be collected, used, stored, shared and retained in accordance with this Privacy Policy and United Kingdom law. The courts of United Kingdom have non-exclusive jurisdiction. This policy is current as at 2 February 2022.

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