

# Privacy Policy

## 1. Introduction

FXGT.com is a brand name operated by GT Global Ltd, a company registered in Seychelles, with registration number 8421720-1 and registered address is Room 12, First Floor, Kingsgate House, Victoria, Mahe, Seychelles, licensed and regulated by the Seychelles Financial Services Authority (FSA) under the Securities Dealer's License Number SD019. (the “**Company**” and/or “**FXGT.com**”).

The Company prepared this Privacy Policy (the “**Policy**”) which provides an overview and an explanation as to how we treat the personal information of individuals who are users of our website <https://fxgt.com> (the “**Website**”) and including but not limited to the use of any of our products, services or applications in any manner.

FXGT.com is committed in taking all reasonable steps in safeguarding the privacy and handle the personal data of its Clients in an open and transparent manner. We consider the privacy and integrity of the personal data of our clients as one of its highest priorities and devote the maximum amount of attention to keep the said data safely stored as well as used appropriately.

By continuing to use this Website, and/or any other services and products offered by and through FXGT.com, the Client confirms that he is of legal age, and expressly agree with this Privacy Policy and consent to the Company’s processing of data, by manual and/or automated means. This includes the collections, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, disclosure, dissemination or otherwise making available, alignment or combination, restriction, erasure and/or destruction of personal data.

All informational material collected on this website is held by the Company in the strictest confidentiality.

This Policy:

- provides a summary on how FXGT.com collects, processes and uses its Client’s personal data and informs the Client about his/her rights;
- is directed to all natural persons who are either current or potential clients of the Company, or are authorized representatives/agents or beneficial owners of legal entities;
- is directed to natural persons who had a past business relationship with FXGT.com;

- provides information about when FXGT.com shares and distributes the personal data of its Clients with third parties and other entities of the FXGT.com Group.

For the purposes of this Policy the following shall apply:

Personal data shall mean any information relating to the Client which identifies or may identify him/her, and which includes, for example, his/her name, address and identification number.

Group shall mean any entity controlled by or controlling FXGT.com and entities under common ownership and control with FXGT.com where control means any director or indirect control, of the majority of the voting rights or capital of an undertaking.

## **2. Collection of Information**

In order to open an account with the Company, the Client must first complete the registration form and then respectively the account verification form, which both requires him/her to provide some personal information. While completing the registration form and the account verification form the Client is requested to disclose private, personal information in order to enable the Company to evaluate his/her application and comply with relevant rules and regulations.

At that stage, the Client is requested to agree with the terms listed in the provided Privacy Policy. The Client confirms acceptance of these terms by ticking the box on the registration form. If the Client does not choose to tick the box, then it is considered that the Client is not giving his/her consent and the Company cannot collect and process his/her data neither provide any additional services to him/her.

If the Client gives the Company his/her specific consent for processing then the lawfulness of such processing is based on that consent. The Client also consents when the Company is transferring his/her personal information to third parties around the world where this is necessary for the Company to fulfil its contractual obligations to its Clients. Moreover, the Client has the right to revoke consent at any time. However, any processing of personal data prior to the receipt of his/her revocation will not be affected.

The Company is obligated to collect such personal data not only for the commencement and execution of a business relationship with the Client but also for the performance of the Company's contractual, regulatory, statutory and legal obligations.

**Note:** If the Client does not provide the Company with the required information, then the Client will not be allowed to commence or continue the above-mentioned business relationship with the Company.

## **2. Information Required**

The Company must collect or/and receive the Client's personal information in order to his/her account with the Company and accept him/her as a Client of the Company. The Company also reserves the right and the duty to check the accuracy of the Client's information/documentation contained in the Company's database by periodically requesting from the Client to update or/and correct or/and confirm the accuracy of the information/documentation. The personal information required includes but is not limited to the following:

- a) Name
- b) Date of Birth
- c) E-mail address
- d) Passport/ID
- e) Home address
- f) Financial Situation
- g) Trading Activity

## **3. Use of Personal Information**

The Company is committed in taking all reasonable steps in safeguarding the privacy and handle the personal data of its Clients in an open and transparent manner. For this reason, the Company processes the Client's personal data in accordance with all data protection laws and regulations for the following reasons:

### **A. Anonymous Statistical Data**

The Company may collect anonymous statistical information in order to ensure that it meets the needs of its Clients. By collecting such data, the Company is able to monitor and improve the

services which it offers to its existing and potential Clients. The Company may share such information with third parties.

## **B. Identity Verification Information**

The Company must confirm the identity of the Client before entering a Client relationship. Therefore, the Company needs to perform its due diligence measures and apply the KYC principles (Know-Your-Customer) in order to prevent actions, such as Money Laundering and Financial Terrorism, as well as perform its duties imposed by law. As such, the Company collects the Client's identity verification information (e.g., ID card or Passport or Driving License or other governmental proof of identification, as permitted by applicable laws). The Company also request from its Clients to provide documents for the verification of address (e.g., recent Utility Bill, Bank Statement/Reference etc.). Other use of Client's Information includes:

- to provide the Client with services that he/she has requested including processing transactions;
- to maintain Client's personal profile; to manage Client's account; to contact the Client when necessary or appropriate in relation to the services being provided to him/her, including via a third-party mailing platform;
- to keep the Client updated in relation to matters such as contracts he/she traded and activities of the Company;
- to manage and administer the products and services provided to the Client;
- to develop an understanding of the products and services that the Client may be interested in obtaining from the Company and to tailor the Website to Client's needs and interests;
- to create impersonalized statistical data;
- to conduct surveys and questionnaires;

## **C. Compliance with legal obligations**

There are a number of legal obligations emerging from the relevant laws to which the Company is subject to as well as statutory requirements. There are also various supervisory authorities whose laws and regulations we are subject to.

Such obligations and requirements impose on us necessary personal data processing activities for credit checks, identity verification, compliance with court orders, tax law or other reporting obligations and anti-money laundering controls.

These include amongst others transaction reporting requirements, assessment of the clients' knowledge and experience, FATCA and CRS reporting.

#### **D. Safeguard of legitimate interests**

The Company processes the Client's personal data in order to safeguard the legitimate interests pursued by the Company or by a third party. A legitimate interest is when the Company has a business or commercial reason to use the Client's personal information. However, even then, it must not unfairly go against what is right and best for the Client.

Such processing activities may include:

- Initiating court proceedings and preparing the Company's defense in litigation procedures,
- Means and processes the Company undertakes to provide for the Company's IT and system security, preventing potential crime, asset security, admittance controls and anti-trespassing measures,
- Measures to manage business and for further developing services and offers,
- Sharing the Client's personal data within the FXGT.com Group for the purpose of updating/verifying his/her personal data in accordance with the relevant Anti-Money Laundering Compliance Framework,
- The transfer, assignment (whether outright or as security for obligations) and/or sale to one or more persons and/or charge and/or encumbrance over, any or all of the Company's benefits, rights, title or interest under any agreement between the Client and the Company.

#### **E. Marketing Purposes**

The Company may use the Client's personal data, such as location or trading history to deliver any news, analysis, research, reports, campaigns and training opportunities that may interest the Client, to his/her registered email address. The Client always has the right to change his/her option if he/she no longer wishes to receive such communications.

#### 4. Third Parties

In order for the Company to perform its contractual and statutory duties, the Client's personal data may be provided to various departments within the Company as well as other companies of the FXGT.com Group. Moreover, the Client's personal data may be distributed and further used by trusted third parties such as, inter alia, various service providers and banking/financial institutions, through which trading operations and the related transactions will take place, so that the Company performs its obligations. These service providers and banking/financial institutions enter into contractual agreements with the Company by which they observe confidentiality and data protection in accordance with all data protection laws and regulations.

Furthermore, the Company may disclose the Client's data for the following reasons:

- Supervisory and other regulatory and public authorities, notary offices, tax authorities, criminal prosecution authorities as much as a statutory obligation exists.;
- Credit and financial institutions such as banks, payment systems and processors, electronic money institutions, institutions participating in the trade execution and execution venues (for example regulated markets, multilateral trading facilities, trade repositories and other local or foreign brokers)
- External legal consultants authorised by the Company
- Financial and business advisors authorised by the Company
- Auditors and accountants authorised by the Company
- Marketing and advertising agencies
- Fraud prevention agencies
- File storage companies, archiving and/or records management companies, cloud storage companies
- External authorised processors for processing client data
- Debt collectors subject to bankruptcy or insolvency claims
- Potential or actual purchasers and/or transferees and/or assignees and/or charges of any of the Company's benefits, rights, title or interest under any agreement between the customer and the Company, and their professional advisers, service providers, suppliers and financiers.

- Business Introducers/Affiliates or other third-party service providers in order to process obligations arising from the agreement with the Client
- Any company of the FXGT.com Group, which shall mean any of the ultimate holding companies and their respective subsidiaries/sister companies and/or companies sharing the same management and ownership.
- The Company's employees so as to exercise their duties in the course of their employment/engagement with the Company

## 5. Marketing Activities

The Company may process the Client's personal data in order to inform the Client about products, services and offers that may be of interest to him/her. The personal data that the Company processes for this purpose consists of information the Client provided to the Company and data the Company collected or/and inferred when the Client uses its services, such as information on the Client's transactions. The Company studies all such information to form a view on what may the Client need or what may interest him/her. In some cases, profiling is used, i.e., the Company processes the Client's data automatically with the aim of evaluating certain personal aspects in order to provide him/her with targeted marketing information on services/offers.

The Client has the right to object at any time to the processing of his/her personal data for marketing purposes or unsubscribe to the provision of marketing related emails by the Company, by contacting at any time the Company's customer support department via email at [compliance@fxgt.com](mailto:compliance@fxgt.com).

## 6. Period of personal information keeping

The Company will keep the Client's personal data for as long as a business relationship exists with the Client, either as an individual or in respect of the Company's dealings with a legal entity the Client is authorised to represent or is beneficial owner. Once the business relationship with the Client ends, the Company is required to keep the Client's personal data for a maximum period of seven years to meet its regulatory and legal requirements.

When necessary or required to meet other legal, contractual or/and regulatory requirements, resolve disputes, prevent fraud and abuse, or enforce the Company's terms and conditions, the



Company may also keep for the Client's personal data for additional three years, even after the above-mentioned period. Where the Company does no longer need the Client's personal data, it will be securely deleted or destroyed.

## 7. Rights of the Client

The Client has the following rights regarding the personal data collected by the Company:

- A. The Client will have access to his/her provided personal data in order to check whether it is correct and that the Company is lawfully processing it.
- B. The Client can request to rectify/correct his/her personal data provided to the Company. This will enable the Client to correct or complete any incorrect or incomplete data. The Company may also request additional information and documentation in order to validate the need for the requested change of data.
- C. The Client can also request to erase his/her personal data provided to the Company. This erasure of the personal data will result in the closure of the Client's account and termination of the client relationship. However, the Company is obliged to keep the Client's personal data in its records in order to perform and comply with its legal and regulatory requirements. The Client's personal data will be maintained in the Company's records for at least seven years following the termination of the client relationship, unless other terms for the maintenance of data or documents are prescribed by law.
- D. The Client can object to the processing of his/her personal data where the Company relies on a legitimate interest and there is something about the Client's particular situation which makes him/her want to object to processing on this ground. If the Client lodges an objection, the Company will no longer process the Client's personal data unless the Company can demonstrate compelling legitimate grounds for such processing which override the Client's interests, rights and freedoms or processing is required for the establishment, exercise or defense of legal claims.
- E. The Client also has the right to object to his/her personal data being processed for direct marketing purposes. This also includes profiling in as much as it is related to direct marketing. If the Client objects to processing for direct marketing purposes, then the Company shall stop the processing of the Client's personal data for such purposes.

- F. The Client can request to receive a copy of the personal data concerning him/her in a format that is structure and commonly used and transmit such data to other organizations. The Client also has the right to have his/her personal data directly transmitted by the Company to other organizations requested by the Client.

## **8. Geographical Area of Processing**

As a general rule, the Client's data may be processed by or/and transferred to other companies of the FXGT.com Group, and sometimes processed or/and transferred to countries inside or/and outside the European Union/European Economic Area (EU/EEA), as well as service providers who are engaged on the Company's behalf and who are inside or/and outside the European Economic Area (EEA).

## **9. Security**

The Company uses appropriate technical, organizational and administrative security measures to protect any information collected and maintained in its records from loss, misuse, and unauthorised access, disclosure, alteration and destruction. Unfortunately, no company or service can guarantee complete security. Unauthorised entry or use, hardware or software failure, and other factors, may compromise the security of user information at any time.

Among other practices, the Client's account is protected by a password for his/her privacy and security. The Client must prevent unauthorised access to his/her account and Personal Information by selecting and protecting his/her password appropriately and limiting access to his/her computer or device and browser by signing off after he/she has finished accessing the account.

Transmission of information via regular email exchange is not always completely secure. However, the Company exercises all possible actions to protect the Client's personal data, yet it cannot guarantee the security of Client data that is transmitted via email; any transmission is at the Clients' own risk. Once the Company has received the client information it will use procedures and security features in an attempt to prevent unauthorised access.



FXGT.com will not be liable for unlawful or unauthorized use of the Client's personal information/passwords/username/login etc., due to misuse or misplacement of passwords, negligent or malicious intervention and/or otherwise.

When the Client emails the Company, or uses the Live Chat feature, he/she may be requested to provide some additional personal data, like his/her name or email address. Such data will be used to respond to him/her query and verify his/her identity. Emails are stored on the Company's standard internal contact systems which are secure and cannot be accessed by unauthorised external parties.

## **10. Links of other websites**

The Website may include links to other websites on the internet. The Company is not responsible for the content of these sites or for any other privacy practices on these internet sites. The Client should read the terms of use and the privacy statements of any such websites. The Company terms of use and its Privacy Policy apply only to information collected by the Company in accordance with this Policy.

## **11. Minors**

FXGT.com is not available for users under the age of 18 (or the age requiring of legal consent of the jurisdiction the user is located in) (a "**Minor**"). The Company does not knowingly collect personal information from or about Minors. If you are a Minor, you should not download or use any of our services nor provide any personal information to us. If the Company becomes aware that a Minor has shared any information with us, the Company will delete such information. If you have any reason to believe that a minor has shared any information with us, please contact us at [compliance@fxgt.com](mailto:compliance@fxgt.com).

## **12. Updates to this Privacy Policy**

The Company reserves the right to modify or amend this Privacy Statement unilaterally at any time in accordance with this provision.

If any changes are made to this privacy statement, the Company shall notify the Client accordingly. The revision date shown on at the end of this page will also be amended. However, the Company



does encourage the Client to review this Privacy Policy occasionally so as to always be informed about how the Company is processing and protecting the Client's personal data.