# **FXTM's Marketing and Communication Policy Statement**

This marketing and communication policy statement tells you about the information we collect from you when you sign up in order to be contacted by FXTM for marketing purposes as described below. In collecting this information, we are acting as a data controller and, by law, we are required to provide you with information about us, about why and how we use your data, and about the rights you have over your data.

#### Who are we?

Our company name is Exinity Ltd and our trading name is FXTM. Our address is:

11th Floor, Maeva Tower, Silicon Avenue, Cybercity, Ebene, 72201, Republic of Mauritius.

We are required to have a data protection officer, so any enquiries about our use of your personal data should be addressed to the below contact details:

Data Protection Officer dpo@exinity.org +44 203 734 10 25

## What personal data do we collect?

We collect information you provide directly to us. When you subscribe with us and create an FXTM account, we ask you for your name and surname, your email address, country of residence, mobile phone and a password. In addition, we collect information when you receive and purchase our services and products through our website, when you register in our mobile applications about any actions you perform therein, your device data and IP address, demographic data, your information when you participate in our contests and promotions, when you fill out forms, communicate with us in any way such as through social media sites and when you request customer support, or otherwise communicate with us.

#### Why do we collect this information?

We will use your information to send you weekly/monthly/annual newsletters, which will contain information about our products and services and often include special offers, new products, promos, contests and the latest information/developments from FXTM. We may also send you various notifications, announcements, market insights, information about events, seminars and webinars and/or any other information which we believe may be useful or necessary for you.

We ask for your consent to do this, and we will only send you the above for as long as you continue to consent.

#### What means of communication do we use?

We may use your information to send you the above notifications, announcements and information by various communication means including emails, SMS, mobile devices, mobile applications, social media, instant messaging platforms and any other means available for communication between us and you and not forbidden by the applicable legislation.

## What do we do with your information?

#### **Shared Data**

Your information is stored in our database and we do not share your personal information with third parties outside of FXTM except in the following cases:

- a) with selected trusted third-parties with whom we work closely and help parts of our business operations and provide:
- cloud and IT hosting services;
- mobile acquisition networks for the performance of mobile application campaigns;
- marketing automating platforms services; in order to send you relevant targeted marketing communications and advertisements that are more relevant to you;
- b) with social media like Facebook, Twitter, LinkedIn, YouTube and advertising platforms like Google in order to create similar audience and show you advertising on different platforms; The information shared with these platforms is pseudonymised to protect your personal data.

Your information is processed based on our instructions and we use the third-party providers to process your information on our behalf. The third-party service provider is only entitled to process your personal data in accordance with our instructions and in compliance with our Privacy Policy

### **Automated Decision Processing and Profiling**

As described above we use marketing automating platforms in which an automated decision-making processing intervenes: during the analysis of your personal information whereas user-agnostic rules are implemented in order to receive customised and automatic marketing communications of your interest by us. This automated decision making-processing does not produce any significant or any legal effect against you. As a result of the automated decision processing we will be able to exclude/include you automatically to our marketing subscription list and you will receive customised communications from us and not communications related to all of our services & products.

In addition, we use pixels (pieces of java code) to read your actions in the website and mobile applications, cookies and IP address information, your personal and demographic data and your behavioural activity during your subscription and visit in our website and mobile applications, in order to analyse and predict your personal preferences and receive more personalised marketing communication related to our services and products. For more information about our use of cookies and how to opt not to receive these please follow the link <a href="here.">here.</a>

You may see your results and an explanation of the automated decision or to request human intervention to the processing or to contest the decision by sending an email to <a href="mailto:dpo@exinity.org">dpo@exinity.org</a>. During these processes, FXTM takes all the technical and operational measures to correct inaccuracies and minimize the risk of errors and to secure your personal data.

## How long do we keep your information for?

If you are not an FXTM client, your information is kept for as long as you continue to consent to receive the above notifications, announcement and/or information. In case you are an approved client of FXTM or you have applied for a trading account your contact details will be kept for purposes other than marketing communications in accordance with our Policy Statement which you can find here.

## Your rights over your information

By law, you can ask us what information we hold about you, and you can ask us to correct it if it is inaccurate.

You can also ask for it to be erased and you can ask for us to give you a copy of the information.

You can also ask us to stop using your information – the simplest way to do this is to withdraw your consent, which you can do at any time. You can do this:

- By visiting the 'Subscription Manager' section of MyFXTM and unsubscribing from specific and/or all subscriptions;
- By emailing at <a href="mailto:support@fxtm.com">support@fxtm.com</a> or
- By calling us on +44 203 734 10 25

Once we receive your request, we will update your profile within 24 working hours, to ensure that you do not receive the information which you do not want.

### Your right to complain

If you have a complaint about our use of your information, you can contact the Office of the Data Protection Commissioner via their website at <a href="http://dataprotection.govmu.org/">http://dataprotection.govmu.org/</a> or write to them at:

The Data Protection Commissioner
Data Protection Office
5th Floor
SICOM Tower
Wall Street
Ebène.

Tel: +2304600251 Fax: +2304897341 Email: dpo@govmu.org