



Data Protection Policy

Version: 2019-06-17

X GLOBAL Markets Ltd

Regulated by Cyprus Securities and Exchange Commission, CIF licence 171/12

162 Franklinou Rousvelt, 1st and 2nd Floors, Limassol 3045, Cyprus

1. Data Protection Policy Statement

This statement confirms our commitment to protect the client(s) employee(s), stakeholder(s) privacy and to process the personal information in accordance with the Regulation (EE) 2016/679 (“herewith the General Data Protection Regulation”) of the European Parliament and of the council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data.

2. Grounds for data Collection

Processing of your personal information (meaning, any data which may potentially allow your identification with reasonable means; hereinafter “Personal Information”) is necessary for the performance of our contractual obligations towards you and providing you with our services, to protect our legitimate interests and for compliance with legal and financial regulatory obligations to which we are subject. When you use our services, you consent to the collection, storage, use, disclosure, and other uses of your Personal Information as described in this document.

3. Personal Information we require

We shall collect and process the following examples of personal information, although we may, at times, also need to collect other personal information that is not listed here:

- a) Identity Information: includes first name, maiden name, last name, proof of identity, username or similar identifier, marital status, title, date and place of birth and gender, country of residence and citizenship. Job title/Occupation
- b) Personal documentation
- c) Contact information (for example address, telephone numbers, email addresses)
- d) Information about age, ethnicity, gender, nationality
- e) Information about education and qualifications
- f) Information about skills and expertise
- g) Financial Information includes annual income, net worth, source of funds, anticipated account turnover, bank account, bank statements, payment card details and copies, e-wallet information. Tax Data includes country of tax residence and tax identification number
- h) Transaction Information includes details about payments to and from you and other details of products and services you have purchased from us, deposit methods, purpose of transactions with us.
- i) Marketing and Communication Information includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We may use/process this information to:

- a) Carry out our statutory functions
- b) Handle complaints
- c) Conduct investigations
- d) Conduct research
- e) Improve our services
- f) Share it with third parties for obtaining professional advice and in complying with our contractual obligations
- g) Send information to clients that we think might be of their personal interest
- h) Comply with our legal and regulatory obligations.

We have set out below, in a table format, a description of all the ways we plan to use your Personal Information, and which of the legal bases we rely on to do so. We have also identified what our



legitimate interests are where appropriate. Note that we may process your Personal Information for more than one lawful ground depending on the specific purpose for which we are using your data.

| Purpose / Activity | Type of Data | Lawful basis for processing including basis of legitimate interest |
|--|---|--|
| To register you as a new customer | (a) Identity (b) Contact (c) Financial (d) Professional (e) Tax | Performance of a contract with you, Compliance with legal obligations |
| To process and deliver your order including: (a) Manage payments, fees and charges (b) Collect and recover money owed to us | (a) Identity (b) Contact (c) Financial (d) Transaction (e) Marketing and Communications | (a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us) |
| To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey | (a) Identity (b) Contact (c) Profile (d) Marketing and Communications | a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services) |
| To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data) | (a) Identity (b) Contact (c) Technical | (a) Necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation |
| To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you | (a) Identity (b) Contact (c) Profile (d) Usage (e) Marketing and Communications (f) Technical | Necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy) |
| To use data analytics to improve our website, products/services, marketing, customer relationships and experiences | (a) Technical (b) Usage | Necessary to comply with a legal obligation |

4. Non- Personal Information

We record and collect data from or about your device (for example your computer or your mobile device when you access our services and visit our site. This includes, but not limited to: your login credentials, UDID, Google Advertising ID, IDFA, cookie identifiers, and may include other identifiers such as your operating system version, browser type, language preferences, time zone, referring domains and the duration of your visits. This will facilitate our ability to improve our service and personalize your experience with us. If we combine Personal Information with non-Personal Information about you, the combined information will be treated as Personal Information for as long as it remains combined.

5. Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that you can still access this website and it will function properly. Cookies are used on this website in order to offer our users a more customized browsing experience. With whom do we share your personal information? - Internal



concerned parties - we share your information with companies in our group, as well as our employees limited to those employees or partners who need to know the information in order to provide you with our services. - Financial providers and payment processors - we share your financial information about you for purposes of accepting deposits or performing risk analysis. - Business partners - we share your information with business partners, such as storage providers and analytics providers who help us provide you with our service. - Legal and regulatory entities - we may disclose any information in case we believe, in good faith, that such disclosure is necessary in order to enforce our Terms or Client Agreement, take precautions against liabilities, investigate and defend ourselves against any third-party claims or allegations, protect the security or integrity of the site and our servers and protect the rights and property of the Company, its users and/or partners. We may also disclose your personal information where requested by our supervisor or any other regulatory authority having control or jurisdiction over us, you or our associates or in the territories we have clients or providers, as a broker. - Merger and acquisitions – we may share your information if we enter into a business transaction such as a merger, acquisition, reorganization, bankruptcy, or sale of some or all of our assets. Any party that acquires our assets as part of such a transaction may continue to use your information in accordance with the terms of this Privacy Policy.

6. Automated decision-making and profiling

In order to perform the contract between us and as authorized by the relevant regulations [Directive 2014/65/EU MIFID, Law 87(i)/2017 and Circular 168 and 028 of Cyprus Securities and Exchange Commission] it is requested for the provision of the portfolio management services to clients and once per calendar year thereafter, to assess clients' knowledge and experience, financial situation and investment objectives and risk profile. We fulfil the above requirements through the following tools:

Appropriateness Test: it takes place when someone requires to register as client of X GLOBAL Markets LTD. Hence, we need to check and ensure that is suitable for the provision X GLOBAL Markets LTD services and products by taking an appropriateness test in regard to client's knowledge, financial background and experience in regard to financial services. Based on the scoring the client receives, he/she will be informed whether is eligible to receive our services and become our Client and the maximum levels of leverage are eligible to. The reason for assessing the appropriateness is to enable X GLOBAL Markets LTD to offer to the client services suitable to him/her and act in the client's best interest.

Suitability Test: it takes place when a client requests to be offered our portfolio management service. In this respect the client will be required to take a suitability test in order to assess his/her financial situation, risk profile and risk tolerance as an investor and that the investment program is suitable for the client. Based on client's scoring, we will be able to assess the investment objectives, if is able financially to bear any related investment risks consistent with your investment objectives. The reason for assessing your suitability is to enable X GLOBAL Markets LTD to act in the client's best interest. The scorings above are monitored by the Compliance department of X GLOBAL Markets LTD and the client may see the results and an explanation of the scoring or to challenge the decision by sending an email to compliance@xglobalmarkets.com. During the above mentioned processes, X GLOBAL Markets takes all the technical and operational measures to correct inaccuracies and minimize the risk of errors, to prevent any discrimination and to secure personal data of the client.

7. Protecting information

We have appropriate technical and organisational measures in place to protect the data's subject information.



We will handle and protect information in line the Regulation (EE) 2016/679 and the data protection principles set out in the Article 5:

- a) Personal data will be processed fairly, lawfully and in a transparent manner in relation to the data's subject.
- b) Personal data will be obtained for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purpose(s)
- c) Personal data will be adequate, relevant and not excessive in relation to the purpose(s) for which they are processed.
- d) Personal data will be accurate and where necessary, kept up to date. The company shall take every reasonable step to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.
- e) Personal data will not be kept for longer than the provisions stated under the article 25 of the Regulation (EU) 600/2014 ("MIFIR").
- f) Personal data will be processed in accordance with the data subject's rights under the Article 6 of the Regulation (EE) 2016/679.
- g) Appropriate technical and organisational measures are in place to protect personal data from unauthorised or unlawful processing and from accidental loss, damage or destruction.
- h) Personal data will not be transferred to a country or territory outside of the European Economic Area (EEA) unless we can be assured there is an adequate level of protection for the rights and freedoms of the data subjects.

8. Guidelines of the Company's personnel

- a) The only people able to access data covered by this policy should be those who need it for their work.
- b) Data should not be share informally. When access to confidential information is required, employees can request it from their line managers.
- c) The company shall provide training to all employees to help them understand their responsibilities when handling data.
- d) Employees shall keep data secure, by taking sensible precautions and following the guidelines.
- e) Strong passwords shall be used, and they shall never be shared.
- f) Personal data shall not be disclosed to unauthorised people, either within the company or externally.
- g) Data should be regularly reviewed and updated if it is found to be out of date. If no longer required, it should be deleted and disposed.
- h) Employees shall ensure the screens of their computer are always locked when left unattended
- i) Data shall be encrypted before transferred electronically.

9. Right of accessing personal information

Under the Article 15 of the Regulation (EE) 2016/679, the person(s) is/are entitled to access their personal information that we hold and to have any inaccuracies in their personal information corrected.

When a person submits a request to access personal information, they are entitled to know:

- a) what personal information we have processed or currently processing
- b) the reason(s) and purpose(s) for the processing of personal information;
- c) know if we have shared personal information and if so, with whom and for what purpose(s).



- d) the recipients or categories of recipient to whom the personal data have been or will be disclosed, in particular recipients in third countries.
- e) where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period
- f) the existence of the right to request from the company rectification or erasure of personal data or restriction of processing of personal data concerning the data subject.

Requests for your personal information must be submitted to us in writing.

Electronic request shall be sent to:

compliance@xglobalmarkets.com

Postal requests should be sent to the company's head offices at:

X GLOBAL MARKETS LTD
162 Frangklinou Rousvelt
1st Floor
3045 Limassol, Cyprus

10. Cooperation with the supervisory authority

The Company, where applicable, their representatives, shall cooperate, on request, with the supervisory authority in the performance of its tasks.

11. Security of processing

Taking into account the state of the art, the costs of implementation and the nature, scope, context and purposes of processing as well as the risk of varying likelihood and severity for the rights and freedoms of natural persons, the controller and the processor shall implement appropriate technical and organisational measures to ensure a level of security appropriate to the risk, including inter alia as appropriate:

- a) the pseudonymisation and encryption of personal data;
- b) the ability to ensure the ongoing confidentiality, integrity, availability and resilience of processing systems and services;
- c) the ability to restore the availability and access to personal data in a timely manner in the event of a physical or technical incident;
- d) a process for regularly testing, assessing and evaluating the effectiveness of technical and organisational measures for ensuring the security of the processing.

12. Breach of Company's security systems

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, XGLOBAL Markets LTD shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the Supervisory Authorities and the Cyprus data commissioner.



13. Sharing Clients personal information

We share information with third parties. This may be for a variety of reasons but will always be to enable us to undertake our statutory functions, and/or to comply with our legal or regulatory obligations.

When a client's personal information is shared it will be done so in line with article 44 and article 45 of the General Data Protection Regulation. The company's clients are entitled to know why and how we are sharing personal information and the organisation or individual receiving the personal information will be required to protect information in line with the provisions set in the General Data Protection Regulation.

14. Marketing Communications

We will comply with the rules set out in the GDPR, the Privacy and any laws which may amend or replace the regulations around direct marketing. This includes, but is not limited to, when we make contact with data subjects by post, email, text message, social media messaging, telephone (both live and recorded calls) and fax.

Any direct marketing material that we send will identify XGLOBAL Markets LTD as the sender and will describe how people can object to receiving similar communications in the future. If a data subject exercises their right to object to direct marketing, we will stop the direct marketing as soon as possible.

15. Recording of communications

We would record communications between the company's personnel and the clients, for the purposes described earlier in this statement under the section 2 of this policy and in order to allow the company's compliance department/control functions and Supervisory Authorities to identify/investigate any breaches of relevant laws and regulations from the company's employees or client(s). We would also record telephone calls for training purposes.

16. The Data Commissioner's Office

The Data Commissioner's Office is an independent authority in Cyprus, set up to uphold information rights in the public interest, promoting openness by public bodies and data privacy for individuals.

For more information visit the commissionaires website at:

<http://www.dataprotection.gov.cy>

Address:

1 Lasonos Str., 1082 Nicosia
P.O.Box: 23378, 1682 Nicosia

Tel: +357 22818456

Fax: +357 22304565

Email: commissionerdataprotection.gov.cy

