

# PRIVACY POLICY

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## 1. Privacy Statement

Protecting the privacy and safeguarding the personal and financial information of our clients and Web site visitors is one of our highest priorities. The following Privacy Statement explains how we collect and protect your information. By opening an account or by using our Web site, you give your consent to the collection and use of personal information by us as explained in this privacy statement.

The following disclosure is made pursuant to the European General Data Protection Regulation (GDPR):

For the purpose of the General Data Protection Regulation (GDPR) 2016/679, the data controller is RaiseFX, located in Republic of Kazakhstan, Almaty, Timiryazev street, building 71, office 17, 050060 (“we”, “us”, “our”).

This privacy statement explains when and why we collect personal information, how we use it, the conditions under which we may disclose it to others and how we keep it secure. This Privacy Statement applies to the use of our products and to our sales, marketing and customer contract fulfillment activities.

## 2. Collection of personal information

We collect information required to open an account, to transact business effectively and to safeguard your assets and your privacy. To do this, we gather information to help us assess your needs and preferences.

The information we collect directly from you includes information required to communicate with you, including your name, mailing address, telephone number, e-mail address and to identify who you are. We also collect demographic information when you open an account, including, birth date, education, occupation, etc. and

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information about your transactions with us. We also assess your trading experience, your approximate annual income and approximate net worth to assess your financial position.

When do we collect personal data about you?

- When you are using our products.
- When you interact with us in person, through correspondence, by phone, by social media, or through our websites.
- When we collect personal information from other legitimate sources, such as third-party data aggregators, our marketing partners, public sources or social networks. We only use this data if you have given your consent to them to share your personal data with others.

## 3. Usage of personal information

We use personal information to provide you quality service and security. For example, we may use the information collected from you to verify your identity and contact information. We may also use this information to establish and set up your trading account, issue an account number and a secure password, maintain your account activity, and contact you with account information. This information helps us improve our services to you, customize your browsing experience and inform you about additional products, services or promotions that may be of interest to you.

We may use your information for the following purposes:

- Send you marketing communications which you have requested. These may include information about our products and services, events, activities, and promotions of our associated partners' products and services. This communication is subscription based and requires your consent.
- Send you information about the products and services that you have purchased from us.

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- Perform direct sales activities in cases where legitimate and mutual interest is established.
- Provide you content and venue details on a webinar or event you signed up for.
- Reply to a 'Contact me' or other web forms you have completed on one of our websites (e.g. to download a whitepaper).
- Follow up on incoming requests (customer support, emails, chats, or phone calls).
- Provide you with access and services related to a Free Trial of our applications.
- Provide access to our Customer Support portal or the website.
- Perform legal and contractual obligations such as order confirmation, license details, invoice, reminders, and similar.
- Notify you about any disruptions to our services (system messages).
- Contact you to conduct surveys about your opinion on our products and services.

## Our affiliates and partners

We may share information with affiliates if the information is required to provide the product or service you have requested or to provide you the opportunity to participate in the products or services our affiliates offer. We may also forge partnerships and alliances, which may include joint marketing agreements, with other companies who offer high-quality products and services that might be of value to our clients. In order to ensure that these products and services meet your needs and are delivered in a manner that is useful and relevant, we may share some information with partners, affiliates and alliances. This allows them to better understand the offers that are most relevant and useful. The use of your personal information is limited to the purposes identified in our relationship with the partner or affiliate. We will enter in Data protection

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agreements with all third parties for protection of your personal data.

## Non-affiliated third parties

We do not sell, license, lease or otherwise disclose your personal information to any third party for any reason, except as described below.

We reserve the right to disclose your personal information to third parties where required by law to regulatory, law enforcement or other government authorities or when necessary to protect our rights or property.

To help us improve our services to you, we may engage another business to help us to carry out certain internal functions such as account processing, order fulfilment, client service, client satisfaction surveys or other support services or data collection activities relevant to our business. Information we collect from you may also be transferred to, and stored at, a destination outside the European Economic Area (“EEA”) including the United States. It may also be processed by staff operating outside the EEA who work for us or for one of our suppliers. We may also provide a party with client information from our database to help us to analyse and identify client needs and notify clients of product and service offerings. Use of the information shared is strictly limited to the performance of the task we request and for no other purpose. All third parties with whom we share personal information are required to protect personal information in a manner similar to the way we protect personal information.

- If you want to withdraw your consent to e-marketing, please make use of the link to manage your subscriptions included in our communication. Please note that you may still receive system messages and administrative communications from us, such as order confirmations, system messages and notifications about your account activities.

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- The right to request that we provide you with your personal data and, if possible, to pass on this information directly (in a portable format) to another data controller when the processing is based on consent or contract.
- The right to request a restriction on further data processing, in case there is a dispute in relation to the accuracy or processing of your personal data.
- The right to object to the processing of personal data, in case data processing has been based on legitimate interest and/or direct marketing.
- The right to complain to us and/or the Data Protection Commission.
- You can submit your request or complaint to us by email

## 4. Changes to This Privacy Statement

From time to time, we may update this Privacy Statement. In the event we change this Privacy Statement, the revised Privacy Statement will promptly be posted to the Web sites and we will post a notice on our Websites informing you of such changes. You agree to accept posting of a revised Privacy Statement electronically on the Web site as actual notice to you. Any dispute over our Privacy Statement is subject to this notice and our Customer Agreement. We encourage you to periodically check back and review this policy so that you always will know what information we collect, how we use it, and to whom we disclose it. If you have any questions that this statement does not address, please contact a Client Services representative.