

## PRIVACY POLICY

### Our Aim is:

- To ensure the confidentiality of personal information
- To protect individuals' right to privacy in compliance with all relevant regulations
- To maintain confidence and trust in the way we handle personal data

This Privacy Policy explains how and why we collect, manage, retain and share personal data about you and what measures we take to comply with the Legislation and to keep personal data secure for the period required.

### Information About FIXI.

FIXI PLC ("FIXI", "we"), having its registered address at 1, KING STREET, LONDON EC2V 8AU, is a firm authorised and regulated by the Financial Conduct Authority (Firm Reference No. 448 399). In addition to its regulatory obligations to the Financial Conduct Authority, FIXI is accountable to the Information Commission Office ("ICO") For any personal data related issues. For more information about FIXI you may refer to <https://www.fiximarkets.com/about-us/about-fixi-markets/>

### Personal Data That We Collect

FIXI collects personal data that is required for the performance of our services to you in keeping with the requirements of our regulator, the Financial Conduct Authority of the United Kingdom (FCA) and other relevant laws and regulations we are governed by. The information collected will also be used for the enhancement of the client experience. In addition, we may use this information for recruitment purposes and HR related matters.

Data we will request will be limited for the purpose and we will not request more personal data than we need in order to perform the above.

Based on the category you may fall into (e.g. prospective client or client, employee etc.) we may request some or all of the following personal information:

Personal Data we collect includes:

- Name
- Date of Birth
- Email address
- Postal address
- Information on employment status and income
- Nationality
- National insurance number
- Postal address
- Information on employment status and income
- Nationality
- National insurance number
- Driving licence (copy of Passport, tax number for residents of certain countries)
- Bank account details
- Telephone number
- IP address

To confirm the above information, we ask you for proof of permanent address, including a utility

bill, a copy of a valid identification document such as a passport or a driving licence. We also collect and store client reports such as trading history and deposit history, and communication between FIXI and the client, including emails and telephone calls, chat logs as per regulatory requirements

For employees, we collect references, previous employment history, Curriculum Vitae, academic records, bank account details and if necessary a criminal records check subject to your specific agreement.

## **Why We Collect Personal Data**

We collect, process and manage your personal data in order to perform our services, rights and obligations set out in the contract with you, to comply with our legal obligations, to exercise our legitimate interests. Please see below the purposes that we may process your personal data for:

- To determine the services and products provided by us is appropriate for you as per regulatory requirements
- To confirm your identity and to maintain your personal profile
- To update your profile on your notification;
- To manage your account and to provide you with account support, including updates, notifications, and matters concerning your trading activities and the activities of FIXI;
- To provide you with information about your account;
- To provide the products and services for which you signed up;
- To comply with the requirements of the FCA, other Regulators and applicable law;
- To settle enquires, defend legal claims and support regulatory requests
- To contact you when necessary or appropriate in relation to services provided to you;
- To keep you updated whilst you are a client in relation to matters such as your trading activities;
- To detect and prevent fraud, unlawful activity and security issues;
- To provide you with access to our payments services for fund management;
- To manage and administer the products and services provided to you;
- To provide you with information regarding the products and services offered by FIXI;
- To assist you in developing an understanding of the products and services that you may be interested in obtaining from FIXI;
- To improve our services and the client experience;
- To provide you with information or opportunities that we believe may be relevant to you;
- To create anonymised statistical data;
- To provide you with security alerts;
- To form profiles in relation to your characteristics, preferences and interactions so that we can make automated decisions in relation to our services, marketing and advertisements;
- To analyse your activity for business reporting activities.

## **Consent**

Where your consent is required for processing of your personal data, we always request it before we obtain and process your personal data and we inform you as to the purpose of the processing. You can withdraw your consent at any time. In cases where we might have shared your data with third parties, we will also notify those parties of your decision to withdraw your consent.

## **How We Collect Personal Data**

FIXI collects and processes personal data from our own website and applications we own, run and manage directly, such as the FIXI registration form on our website, from the client MT4 and or MT5 account and from demo accounts, webinars and newsletters for which individuals sign up from time to time.

FIXI also collects personal data via third parties with whom we do business, such as Introducing Brokers or via third parties' websites through which individuals sign up for FIXI products.

When we collect personal data via third parties, we ensure that these parties have asked for your consent before they share your data with us. Subsequently, we always identify ourselves in our first communication to you and state the purpose for which we require the data.

Also, for regulatory purposes, we reserve the right to obtain information on you from other sources such as credit reference agencies or fraud prevention agencies.

## **How Long We Keep Personal Data For (Retention of Data)**

We do not keep personal data longer than is necessary for the purpose or purposes for which it was collected.

- Clients - we are obliged by the FCA to keep records of our clients for a 5-year term post termination/closure of account, unless we need to retain such data for a longer period (legitimate interest, legal obligation).
- Prospective clients (leads) – currently the company retains data for a maximum term of 2 years post application, provided the prospective client has remained inactive, unless the prospective client expressly requests deletion of their data from our database.
- For prospective employees - currently FIXI retains data for 1-year post rejection of the application for a position, unless the prospective employee expressly requests deletion of their data from our database prior to the expiration of one year.

We have introduced appropriate technical measures to destroy or to erase from our systems all personal data which is no longer required.

Where you have opted out of receiving marketing communications, we will hold your details on our suppression list so that we know you do not wish to receive communication related to our marketing activities.

## **Your Rights**

FIXI is required by Legislation to respond to any personal data request within 30 days, unless the type of request requires more time for investigation and assessment. The privacy rights which are applicable in our industry are the following:

- You have access right; This means that you may request for a copy of your personal information that FIXI holds. The initial request is free of charge; however, depending on volume and complexity of the matter, we may charge a reasonable administrative fee for subsequent requests.
- You have a right to update your profile, so that the personal data we hold is accurate and up to date. We would subsequently notify any third party with whom we might have shared your personal data, including processors, and ask them to also update their records.
- To You may request your personal data to be deleted from our records. In order for us to be compliant with our Regulator, this may not be done instantaneously (Please see section "Retention of Data"). Where deletion is permitted, we will also inform any third parties

with whom we might have shared your personal data and request them to delete your personal data from their records.

- You may request not to be contacted for any marketing related purposes. This can be done via our “unsubscribe button” or via our privacy email address.
- You can object, at any time, to any decisions that we may take that are purely based on automated processing (including profiling). Profiling involves the use of technology that helps us make decisions automatically, based on your personal data that we collect from you or from third parties
- You may file a complaint. If you are not satisfied with the way that your complaint was handled by FIXI, you can address your complaint to the FIXI Plc, 1, King Street, London EC2V 8AU, United Kingdom), [compliance@fixi.com](mailto:compliance@fixi.com)

## **Sharing Personal Data**

FIXI does not sell personal data to third parties. We may share your personal information with third parties for specific purposes, in relation to the performance of our services, our legal obligations or for public interest purposes. Third parties with whom we may share your personal data are:

- The Financial Conduct Authority or/and (when legitimately required so to do) with other regulatory and government bodies in the UK or other countries.
- Other companies within our group that provide us with IT, administration and other support services
- Service providers and specialist advisers who have been contracted to provide us with administrative, financial, insurance, audit, research or other services
- Introducing brokers
- Courts, tribunals and other legal authorities
- Credit reporting or reference agencies
- Credit providers
- Any third party with whom you may authorise us to share your personal data.

## **Transfers Outside the EEA**

We may transfer your personal data outside of the European Economic Area (EEA). In those cases, we ensure that adequacy rules apply or the third party to whom we transfer the data has provided appropriate safeguards on security and confidentiality in relation to the transfer.

## **Security**

We hold personal information in a combination of secure computer storage facilities in electronic and other means, and we take appropriate technical measures to protect personal information from misuse, loss, unauthorised access, modification or disclosure.

## **Cookies**

Cookies are pieces of information that a website transfers to your hard drive to store and sometimes track information about you. They are stored on your device (laptop, smartphone, desktop) when you visit a website.

FIXI uses cookies to navigate between its webpages efficiently, to personalise content and ads, to provide social media features, to analyse traffic and to improve the user’s experience.

We may also share information about your use of our site with our social media, advertising and analytics partners. You can find more information about cookies [www.allaboutcookies.org](http://www.allaboutcookies.org) You have the option of turning this function off via your browser settings. However, this may affect your ability to view parts of the website or to access certain applications. For information about the cookies on our site, please visit our 'Cookie Policy': <https://www.fiximarkets.com/assets/documents/markets/Cookies-Policy.pdf>

### **Personnel Training and Awareness**

All FIXI staff and any support services providers are trained in handling personal data and confidential information on an ongoing basis.

### **Contact Information**

Head of Compliance  
FIXI Plc  
1, King Street,  
London  
EC2V 8AU  
United Kingdom

Email: [compliance@fixi.com](mailto:compliance@fixi.com)