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## **Protection of Personal Information**

### FXIFY SOLUTIONS LIMITED (“FXIFY”) Protection of Personal Information Policy for Customers residing in Canada

#### **1. Policy Context**

##### **1.1. Context Description**

In the course of its daily activities, FXIFY may gather personal information from individuals, in order to provide services, make decisions and support its business operations, programs and activities.

This Policy was developed according to the requirements of, and in compliance with, the Privacy Act of Canada.

##### **1.2. Principles**

FXIFY has long recognized and accepted its responsibility to protect the privacy of individuals who interact with FXIFY through electronic or other means and to safeguard their personal information.

#### **2. Policy Statement**

The purpose of this policy is to outline the FXIFY’s commitment to protect personal information and manage this information with the utmost responsibility and care.

It governs the collection, use, and disclosure of all personal information of individuals who interact with the FXIFY, regardless of whether the information is held in paper, electronic or digital form.

#### **3. Scope**

This Policy applies to information collected by FXIFY or on behalf of FXIFY by service providers pursuant to a contract.

FXIFY will identify the purposes for which personal information is collected at the time or before the information is collected. These purposes include but are not limited to manage:

- Online registration as costumers of FXIFY;
- Any such other purposes as required by the FXIFY

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FXIFY reserves the right, in appropriate circumstances, to collect and hold information outside of Canada.

## 4. Mandatory Policy Requirements

### 4.1. Limiting collection, use and disclosure of personal information

- FXIFY only collects personal information that relates directly to authorized programs or activities.
- Wherever possible, personal information is collected directly from the individual to whom the information relates and individuals are informed of the purpose of the collection at the time of the collection.
- FXIFY only uses personal information or discloses it to third parties for the purpose for which the information was originally obtained or compiled, for a use consistent with that purpose or for a purpose permitted under the Privacy Act.
- The consent of the individual in question must be obtained before his or her personal information is used or disclosed for any other purpose.
- Any disclosure to third parties will be done pursuant to agreements setting out the requirements for use, safeguarding, retention and disposal of such information, or as required by law.

### 4.2. Safeguarding personal information

- Personal information, whatever its form, is classified according to the sensitivity of the information and is protected from unauthorized access, use, disclosure, removal, alteration and destruction in accordance with the FXIFY's Internal Security Policy and Operational Standard: Information Security Policy.
- FXIFY may use outside service providers or agents to collect and/or use personal information on its behalf. As part of the contractual agreements, these suppliers must protect personal information in a manner consistent with the privacy policies and practices established by FXIFY and as obligated under the Privacy Act.

### 4.3. Retention and disposal of personal information

- FXIFY retains and disposes of personal information in accordance with the FXIFY's Corporate Records Management Policy, which meets the requirements set out in applicable legislation (i.e. the Privacy Act, the Library and Archives Act).

- Retention schedules for Personal Information held by FXIFY are correlating with the requirements as set out in applicable legislation.

#### 4.4. Access to, and accuracy of, personal information

- Upon request, FXIFY shall provide an individual with timely access to his or her personal information contained in records under the control of the FXIFY. Individuals may also request correction to their personal information which is under the FXIFY's control. Requests can be made in writing to the FXIFY's Access to Information and Privacy Coordinator citing the Privacy Act.
- FXIFY may require sufficient information to allow it to confirm that the person making the request is authorized to receive the related information before granting access or making corrections.
- Access will not be provided when the records contain information that would be exempt from access under the Privacy Act, such as containing personal information about other individuals. If access to personal information cannot be provided, FXIFY shall provide the reasons for denying access.

#### 4.5. Responding to privacy complaints

FXIFY is committed to investigating and resolving all complaints related to privacy, confidentiality or its information-handling practices in the most thorough, prompt and confidential manner possible. Any individual who believes their privacy or access-related rights have been breached can submit a complaint in writing to the FXIFY's Access to Information and Privacy Coordinator at:

Email: [support@fxify.com](mailto:support@fxify.com).

Postal:

FXIFY SOLUTIONS LIMITED

Unit 1 74 Back Church Lane, London, E1 1LX UK

## 5. Privacy breaches

A privacy breach involves the improper or unauthorized collection, use, disclosure, retention and/or disposal of personal information. FXIFY takes seriously any information or complaint pertaining to a breach of privacy. Any complaint, allegation or information regarding possible breaches of privacy are considered and

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assessed in a consistent manner and investigated fairly and impartially in a manner commensurate with the nature of the alleged complaint.

### 5.1. Further Advice and Guidance

This section contains information on frequency of review, maintenance, and contact information should users have questions related to specific aspects of the policy.

### 5.2. Frequency of reviews and maintenance

Any updates and amendments to this policy and the effective date shall be determined by the General Counsel and Corporate Secretary and communicated on the FXIFY's website.

### 5.3. Enquiries

See the Access to Information and Privacy section on the FXIFY's website.