



AMEGA

Data Protection Policy

Effective December 5, 2022

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1. Introduction

- 1.1. The General Data Protection Regulation (“GDPR”) 679/2016, replaces the 1995 Data Protection Directive (95/46/EC), and it is designed for the protection of natural persons with regards to processing of personal data and on the free movement of such data. It harmonises data privacy laws and it addresses the export of personal data outside the EU with the aim to protect all citizens’ data privacy and reshape the way organisations approach data privacy.

2. Grounds for data collection

- 2.1. 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.
- 2.2. When you use our services, you consent to the collection, storage, use, disclosure and other uses of your Personal Information as described in this Policy.

3. The personal information we collect about you

- 3.1. We may collect, use, store and transfer various kinds of personal information about you which we have grouped together as follows:
 - **Identity information:** includes first name, maiden name, last name, proof of identity, username or similar identifier, marital status, title and place of birth and gender, country of residence and citizenship.
 - **Contact information:** includes billing address, delivery address, email address and telephone numbers.

- **Personal information:** includes level of education, profession, employer name, work experience in Forex/CFDs, information on client's experience, knowledge in the forex industry and risks.
- **Tax Data:** includes country of tax residence and tax identification number.
- **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.
- **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.
- **Profile Data:** includes your username and password, purchase or order made by you, your interests, preferences, feedback and survey responses.
- **Usage Information:** includes information about how you use our website, products and services.
- **Marketing and Communication Information:** includes your preferences in receiving marketing from us and our third parties and your communication preferences.
- **Information about criminal convictions and offences.**

4. Non-personal information

- 4.1. 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 personalise your experience with us.

- 4.2. 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 and tracking technologies

- 5.1. When you visit or access our services we use (and authorise third parties to use) pixels, cookies, events and other technologies (“Tracking Technologies”). These allow us to automatically collect information about you, your device, and your online behaviour, in order to enhance your navigation in our services, improve our site’s performance, perform analytics and customise your experience on it. In addition, we may merge information we may obtain from other sources and, as a result, such information may become Personal Information.
- 5.2. Our Company uses Google Analytics, Google Tag Manager, Google Adwords (Conversion Tracking), Facebook (Conversion Tracking). Technologies such as: cookies, beacons, tags, and scripts are used by our partners, affiliates, analytics or service providers. We may receive reports based on the use of these technologies by such companies on an individual as well as aggregated basis.

6. How we use your personal information

- 6.1. We will only use your Personal Information when the Law allows us to. Most commonly, we will use your Personal Information in the following circumstances:
 - Where we need to perform the contract we are about to enter into or have entered into with you.
 - Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.

- Where we need to comply with a legal or regulatory obligation.

7. Purposes for which we will use your personal information

- 7.1. 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 basis we rely on to do so. We have also identified what our legitimate interests are where appropriate.
- 7.2. 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	<ul style="list-style-type: none"> a. Identity b. Contact c. Financial d. Professional e. Tax 	<ul style="list-style-type: none"> ➤ Performance of a contract with you ➤ Compliance with legal obligations
To process and deliver your order including: <ul style="list-style-type: none"> a. Manage payments, fees and charges b. Collect and recover money owed to us 	<ul style="list-style-type: none"> a. Identity b. Contact c. Transaction d. Financial e. Marketing and Communications 	<ul style="list-style-type: none"> ➤ Performance of a contract with you ➤ Necessary for our legitimate interests (to recover debts due to us)
To manage our relationship with you which will include: <ul style="list-style-type: none"> a. Notifying you about changes to our terms or privacy policy 	<ul style="list-style-type: none"> a. Identity b. Contact c. Profile d. Marketing and communications 	<ul style="list-style-type: none"> ➤ Performance of a contract with you ➤ Necessary to comply with a legal obligation ➤ Necessary for our

<p>b. Asking you to leave a review or take a survey</p>		<p>legitimate interests (to keep our records update and to study how customers use our products/services)</p>
<p>To administer and protect our business and this website (including troubleshooting, data analysis, testing system, maintenance, support, reporting and hosting of data)</p>	<p>a. Identity b. Contact c. Technical</p>	<ul style="list-style-type: none"> ➤ 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) ➤ Necessary to comply with a legal obligation
<p>To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you</p>	<p>a. Identity b. Contact c. Profile d. Usage e. Marketing and communications f. Technical</p>	<ul style="list-style-type: none"> ➤ 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)
<p>To use data analytics to improve our website, products/services, marketing, customer relationships and experiences</p>	<p>a. Technical b. Usage</p>	<ul style="list-style-type: none"> ➤ Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
<p>To perform automated decision in order to identify your knowledge and experience in Forex industry and to identify your risk</p>	<p>a. Identity b. Financial c. Professional</p>	<ul style="list-style-type: none"> ➤ Necessary to comply with our legal obligations

profile (appropriateness and suitability test)		
To make suggestions and recommendations to you about our services that may be of interest to you	<ul style="list-style-type: none"> a. Identity b. Contact c. Technical d. Usage e. Profile 	Necessary for our legitimate interests (to develop our products/services and grow our business)

8. Marketing purposes

- 8.1. We will use your Personal Information (such as your email address or phone number).
- 8.2. Opt-out if you do not want us to use or share your Personal Information for marketing purposes, you may opt-out in accordance with this “Opt-out” section. Please note that even if you opt-out, we may still use and share your personal information with third parties for non-marketing purposes (for example to fulfil your requests, communicate with you and respond to your inquiries, etc). In such cases, the companies with whom we share your Personal Information are authorised to use your Personal Information only as necessary to provide these non-marketing services.

9. Cookies

- 9.1. 9.1. 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 customised 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, reorganisation, 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 Policy.

9.2. Some of our external third parties are based outside the European Economic Area (EEA) so their processing of your personal data will involve a transfer of data outside the EEA.

9.3. Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.

10. Recording of telephone conversations and of electronic communication

- 10.1. We record, monitor and process any telephone conversations and/or electronic communications between us such as through fax, email, social media, electronic messages, either initiated from the Company's side or your side. All such communications are recorded and/or monitored and/or processed by Amega Markets LLC, including any telephone conversations and/or electronic communications that result or may result in transactions or client order services even if those conversations or communications do not result in the conclusion of such transactions. The content of relevant in person conversations and/or communications with you may be recorded by minutes or notes. Any such records shall be provided to you upon request at the same language as the one used to provide investment services to you.

11. How we protect your personal information

- 11.1. We have implemented administrative, technical and physical safeguards to help prevent unauthorised access, use or disclosure of your Personal Information. Your information is stored on secure servers and it is not publicly available. We limit access to your information only to those employees or partners that need to know the information in order to enable the carrying out of the agreement between you and the Company.
- 11.2. Amega Markets LLC is concerned with protecting your privacy and data, but we cannot ensure or warrant the security of any information you transmit to Amega Markets LLC or guarantee that your information on Amega Markets LLC may not be accessed, disclosed, altered or destroyed by breach of any of our industry standard physical, technical

or managerial safeguards. When you enter sensitive information (such as personal name, phone and/or email) on our registration or order forms, we encrypt that information using secure socket layer technology (SSL). However, no method of transmission over the Internet or method of electronic storage is 100% secure, however. Therefore, we cannot guarantee its absolute security. We use an outside help platform, some trading services and a credit card processing company to bill you.

12. Compromise of personal information

- 12.1. In the event that personal information is compromised as a breach of security, the Company will promptly notify our customers in compliance with applicable law. We will retain your personal information for as long as necessary to provide our services and as necessary to comply with our legal obligations, resolve disputes and enforce our policies.

13. Retention

- 13.1. We will retain your personal information for as long as necessary to provide our services and as necessary to comply with our legal obligations, resolve disputes and enforce policies.
- 13.2. To determine the appropriate retention period for Personal Information, we consider the amount, nature and sensitivity of the Personal Information, the potential risk of harm from unauthorised use or disclosure of your Personal Information, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.

14. Legal rights

- 14.1. Under certain circumstances, you have rights under data protection laws in relation to your personal data:

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- **Request access** to your personal information (commonly known as a 'data subject access request'). This enables you to receive a copy of the personal information we hold about you and to check that we are lawfully processing it.
 - **Request correction** of the personal information that we hold about you. This enables you to have any incomplete or inaccurate information we hold about you corrected.
 - **Request erasure** of your personal data. This enables you to ask us to delete or remove personal data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your personal data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your personal data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
 - **Object to processing** of your personal data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your personal data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
 - **Request the restriction** of processing of your personal data. This enables you to ask us to suspend the processing of your personal data in the following scenarios:
 - a. If you want us to establish the data's accuracy

- b. Where our use of the data is unlawful but you do not want us to erase it
 - c. Where you need us to hold the data even if we no longer require it as you need it to establish, exercise or defend legal claims
 - d. You have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it
- **Request the transfer** of your personal data to you or to a third party. We will provide to you, or a third party you have chosen, your personal data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- **Request to withdraw** consent where we are relying on consent to process your personal data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

15. Time limit to respond

- 15.1. We try to respond to all legitimate requests within one month. Occasionally, it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

16. Account closure

- 16.1. If you terminate your account, please be aware that Personal Information that you have provided us may still be maintained for legal and regulatory purposes (as described above), but it will no longer be accessible via your account.
- 16.2. If you wish to exercise any of the GDPR rights set out above, please send an email to dpo@amegafx.com.

17. Amendments and updates

- 17.1. This Policy is subject to changes from time to time at our sole discretion. The most current version will always be available on our website. You are advised to check for updates regularly. In the event of material changes, we will provide you with a notice. By continuing to access or use our services after any revisions become effective, you agree to be bound by the updated Policy.