



# PRIVACY POLICY

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## Introduction

This statement outlines the policy, of XS Ltd (“the Company” or “we” or “us”) and its Affiliate Members (both the Company and its Affiliate Members hereinafter be referred jointly as “the Companies”), on how the Companies manage the personal information that they hold about the Company’s clients and others. This privacy policy applies to all website users, whether you are a former, existing or potential client or just a visitor of our website. For purposes of the data protection legislation, the Companies are the Data Controllers.

Your privacy is of the utmost importance to everyone involved. To protect your privacy, we follow different principles in accordance with worldwide practices for client privacy and data protection.

- We will not sell or give away your name, mail address, phone number, email address or any other information to anyone, except as described in this policy.
- We will use various security measures to protect your information from unauthorised use.
- We may pass your personal information to the Companies,
- We may also pass your personal information to technology providers and/or social trading businesses as needed.
- Any or all of these persons, bodies or entities may contact you with information about services, which may be of interest to you, including via email, SMS, fax or automated calling systems: please tick the relevant box on our web page to confirm that you agree to this.

## Personal Information

Given the nature of our business and the need to efficiently carry out the services we provide to you, we will collect personal information.

## Notice

When required, you will be asked to provide information that personally identifies you (personal information) or allows us to contact you. Generally, this information is requested when you apply for a demo or a live account with us as well as participating in any offer we promote to our existing or potential clients as well as to any visitors on our website. In addition to providing you with sales and post-sales services, we use your personal information primarily to introduce you to our Affiliate Members, treat you fairly, understand your financial goals, and ensure that relevant services are appropriate to your profile.

The personal information that will be collected from you include:

- personal details you provide to us on applications and other forms,
- financial details such as estimated annual income and net worth and your trading experience and investment knowledge,
- documents that you provide to us to verify your identity, such as your passport, utility

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bills, and/or bank statement or your company incorporation details.

## Use and Disclosure of your Personal Information

The Companies may use your personal information for one or more of the following purposes:

- to confirm your identity;
- to assess your suitability to the products and services our Affiliate Members provide;
- to process your transactions;
- to provide you with transaction and post transaction related services;
- to inform you of products and/or services that may be of interest to you;
- to keep you updated on the issues that are relevant to your business relationship with the Companies;
- to improve our website;
- to analyse statistical data which enable us to provide you with better products and/or services.

We and/or our Affiliate Members occasionally hire other companies to provide limited services on our behalf, including sending newsletters and other correspondence whether through electronic means or via postal mail, etc. We and/or our Affiliate Members will only provide those companies the information they need to deliver the service, and they are prohibited from using that information for any other purpose.

The Companies will disclose your personal information, without notice when required to do so by law or in good faith that such action is necessary to:

- i. protect the Companies' rights and/or comply with any court order or judicial proceedings;
- ii. avoid any potential fraud;
- iii. conform to the edicts of the law or comply with a legal process served on us, our Affiliate Members or the site;
- iv. protect and defend the rights or property of us, our Affiliate Members and its family of Websites, and,
- v. act in urgent circumstances to protect the personal safety of users of us, our Affiliate Members, its Websites, or the public.

## Cookies

We use cookies to gather information about your access to our website and other services we provide to you. Cookies are small files of letters and numbers, which use a unique identification tag and if you agree, they are stored on your device as a result of you using this website or other services we provide to you. These cookies allow us to distinguish you from other users of our website, which helps us to provide you with a good experience when you browse our website and allows us to improve our website.

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Please click at the relevant point on our website to confirm that you agree to our use of cookies on your device.

Most internet browsers are set up to accept cookies. If you do not wish to receive cookies, you may be able to change the settings of your browser to refuse all cookies or to have your computer notify you each time a cookie is sent to it, and thereby give yourself the choice whether to accept it or not. However, this may impair the quality of the services that the Companies provide to you in relation to your account.

## Hyperlinks

The Company's and/or our Affiliate Members website may contain hyperlinks or links to other sites, and other sites may link to our sites. These websites that may be linking to or from Company's site may have its own privacy policies. XS Ltd privacy policy applies exclusively to the Company and information collected by us.

The Company and/or our Affiliate Members are not responsible for the privacy policies or the content of the sites you link to, nor do we have control over the use or security of information provided by you or collected by those sites. If you choose to link to one of these websites, you may be asked to supply registration or other information. It is important that you realize this information is going to a third-party, and you should become familiar with the privacy policy provided by that third-party.

## Consent

By visiting and/or accessing this website, you consent to the collection, maintenance and use of your personal information by the Companies, as per this policy.

## Security, Storage and Retention of your Personal Information

The Companies have taken strong measures to protect the security of your personal information and to ensure that your choices for its intended use are honored. The Companies take strong precautions to protect your data from loss, misuse, unauthorised access or disclosure, alteration, or destruction.

The Companies strictly protect the security of your personal information and honor your choices for its intended use.

You also have a significant role in protecting your information. No one can see or edit your personal information without knowing your username and password, so do not share these details with others.

We generally need to keep your personal information on record for a period of at least seven (7) years, which is calculated after the execution of the transactions or the termination of the business relationship or in the case you wish to terminate your working relationship with us. Subject to that, when we consider information is no longer needed, we will remove any details that will identify you or we will securely destroy the records.

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## Access

You have the right to obtain a copy of any personal information which the Companies hold about you and to advise us of any perceived inaccuracy. To make a request, please write to us, verifying your identity and specifying what information you require. We may charge a fee to cover the cost of verifying the application and locating, retrieving, reviewing and copying any material requested. We will acknowledge your request and respond to it within 40 days of receipt of your application and any applicable fee.

## Change of Information

You may inform the Company at any time that your personal information has changed or that you wish the Company to delete information we hold about you by emailing us at [backoffice@xs.com](mailto:backoffice@xs.com). We will change or delete your personal information in accordance to your instructions, except to the extent that we are required to hold your personal information for regulatory or legal purposes, to provide you with the Services you have requested or to maintain adequate business records.

## Enforcement

We reserve the right to change this policy anytime. Changes will be posted on this website, therefore you are encouraged to visit and review this policy from time to time. In case you have any queries, wish to access or update your personal details, or do not wish to receive marketing material from us, please email us at [compliance@xs.com](mailto:compliance@xs.com).

## Links to third party websites

This website may have links to external third-party websites that may benefit you. Please note, however, that third party websites are not covered by our Privacy Policy and these sites are not subject to our privacy standards and procedures.

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