



PRIVACY POLICY

www.xelansmarkets.com

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1. Introduction

Xelans Markets Limited ("XELANS MARKETS") ("the Company") incorporated in Mauritius under Registration Number GB23201934, with its registered address at 1st Floor, Standard Chartered Tower, 19 Cybercity, Ebene, Republic of Mauritius. All persons responsible for using data are subject to strict rules relating to the collecting, processing, and use of personal information. In Mauritius, personal data is protected under the Data Protection Act 2017, which aligns with international standards and safeguards the rights to privacy and protection of personal information. XELANS MARKETS elects to protect client personal data in accordance with minimum global standards. XELANS MARKETS endeavors to ensure personal information and data is protected against unlawful or unauthorized use including loss or damage. Hence the policy extends to enhancing cybersecurity by implementing adequate processes and controls and regular assessment thereof to monitor appropriateness and adequacy. Data collected is:

- used fairly and lawfully
- used for limited, specifically stated purposes
- used in a way that is adequate, relevant and not excessive
- accurate
- kept for no longer than is absolutely necessary
- handled according to people's data protection rights
- kept safe and secure
- not transferred without adequate protection

The Company is the data controller in respect of the information it gathers from its clients including that obtained via email communication, social media platform and direct messaging. The Company views the protection, privacy, and the safeguarding of that personal and financial information of clients as a high priority.

This statement outlines the Company's privacy policy and explains how the Company ensures all personal information collected by it remains confidential and how it respects the privacy of individuals and always safeguards it. By opening an account, clients give their consent to the collection and use of personal information by the Company as explained in this privacy statement.

2. Collection of and Use of Personal Information

The Company obtains details from each client to verify their identity and assess appropriateness for opening a trading account. Information collected includes personal names, physical and email addresses, telephone numbers, dates of birth, occupation, passport and other identification details, and personal financial information including annual income and approximate net worth to assess a client's financial positions. In addition, the Company may collect other information to better assess a client's particular interests, e.g. for general marketing purposes.

We may send you information by SMS, push notification, email or in-app notification about our products, services and offers we think would be of interest to you, upon your consent. The information we send you will always be in relation to the services or products you have requested from us and our communications to you is because we want you to hear more about what we can offer you as our customer and to give you opportunities to use our products and services in a better and more frequent way. We will only ever send you communications that you would reasonably expect based on the information collected from you and your preferences with minimal impact on your privacy.

If you no longer wish to receive email communications from us about the market or your activity on the platform, please use the unsubscribe link within the email and we will stop sending you this information via email. Alternatively, when you are logged into your account you can manage your preferences by going to the "Notifications Settings" tab and selecting the type of notification you would like to receive (email, SMS, push notification). You can change these preferences at any time.

Please note that push notifications are sent to every device you have logged into your account from. If you use another person's device to log into your trading account or allow another person to log into their trading account

using your device, this will result in push notifications being sent to the device(s) used to access the trading account. Therefore, if you have used

another person's device to log into your trading account or have allowed another person to log into their trading account using your device please contact Customer Service to request the removal of a particular device from a trading account.

Note: Changes to your notification settings will be processed as soon as practical.

3. Our Affiliates and Partners

The Company may at times enter partnerships and alliances which may include joint marketing and affiliate agreements with other companies who offer products and services for a fee that might be of value to the Company's clients. The Company may share information with such partners and affiliates if the information is required to provide the product or service a client has requested; or to provide a client the opportunity to participate in the products or services the partner or affiliates offer; and to ensure that such products and services meet a client's needs and are delivered in a manner that is useful and relevant. The use of a client's personal information is limited to the purposes identified in the Company's relationship with the partner or affiliate.

4. Using Your Information to Help in the Prevention of and Including Terrorism and Crime

Where we are required by law, your personal information may also be disclosed to an applicable governmental, regulatory or enforcement authority. These authorities may then use your personal information to investigate and act on any breach of law or regulatory rules in accordance with their procedures.

5. Third Parties and Transfers of Personal Data

The Company does not sell, license, lease or otherwise disclose any client's personal information to any third party for any reason, except in the following circumstances:

- where required by regulatory, law enforcement or other government authorities;
- when necessary to protect the Company's rights, users, systems or property. In such instances, we may use legal and professional advisors bound by confidentiality clauses;
- to help improve services to clients where the Company may engage another business to help carry out some internal functions such as account processing, software, system and platform support;; cloud hosting services; advertising including affiliate advertising; data analytics; order fulfilment and delivery, direct marketing services, customer service, client satisfaction surveys or other support services or data collection activities relevant to the Company's business.
- In the case of a sale, restructure, merger, acquisition, assignment, transfer, joint venture, or other disposition of all or any portion of our business, equity or assets (including in relation with any bankruptcy or similar proceedings).

Information may be processed by staff who work for the Company or for one of the Company's suppliers. The Company may also provide a party with client information from a Company database to help 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 of the Company's requests and for no other purpose.

All third parties with whom the Company shares personal information are required to protect personal information in compliance with the methods and processes assumed by Xelans Markets Limited. Third parties may only use the personal data for the purpose which Xelans Markets has contracted them and may not use it for any other purpose.

6. International Data Transfer

The nature of our services and relations with our trusted third-party providers may require the processing of your personal data in other jurisdictions other than Mauritius. In such instances, we will ensure to maintain and uphold the standards applicable to the jurisdiction with the strictest regulatory standards. Where necessary appropriate safeguards will be implemented and such data transfers made in accordance with applicable legislative provisions. We will adopt all the necessary measures to ensure the security of your personal data pursuant to our legal obligations and industry standards.

7. Security

All information that clients provide to the Company is stored on secure servers. Payment transactions are encrypted using SSL technology. Where the Company has given, or where a client has chosen, a password to access certain parts of the trading platform, the client is responsible for keeping the password confidential and clients should not share the password with anyone.

The transmission of information via the Internet can never be completely secure. Although the Company does its best to protect personal data it cannot guarantee the security of data through email communication and any transmission is at a client's own risk. Once it has received client information the Company will use strict procedures and security features to try to prevent unauthorized access.

8. Restriction of Responsibility

If at any time any client chooses to purchase a product or service offered by another company, any personal information the client shares with that company will no longer be controlled under this Company's privacy policy. The Company is not responsible for the privacy policies or the content on any other sites and has no control over the use or protection of information provided by clients or collected by those sites. Whenever a client elects to link to a co-branded platform, the client may be asked to provide registration or other information and such information will be going to a third party and the client should therefore first become familiar with the privacy policy of that third party.

9. Marketing

The Company may use client data to provide information about products and services which could be of interest and Company staff or agents may contact a client about them by email, WhatsApp and Viber. Personal data may also be used to advertise our products and services using email, WhatsApp and Viber or other social media channels. To prevent information being used in this manner, clients should tick the relevant boxes when being asked for their marketing preferences. These set preferences can be changed at any time by contacting the Company. An opt-out election made by one account owner of a joint account is applicable to all account owners of the joint account. An opt-out election must be made for each separate account a client holds with the Company.

10. Using email, Live Chat, social media and/or instant messaging services

You may contact us using various methods such as the "Contact Us page", the Live Chat feature, social media applications and instant messaging services such as WhatsApp or Viber). You will be required to submit specific personal information such as your name, email address and residential address. This information will be used to verify your identity, respond to your query and to comply with our internal policies. Your information will be stored securely and will not be accessed by third parties without your prior written consent.

11. Training of Staff

The Company provides regular training to our staff on their privacy obligations. We regard data protection breaches very seriously and will enforce appropriate action whether the breach is deliberate or through negligence.

12. Recording Telephone Calls

The Company may monitor or record phone calls with you in case we need to check we have carried out your instructions correctly, to resolve any queries or issues, for regulatory purposes and to help improve our quality of service and to help detect or prevent fraud or other crimes. Conversations may also be monitored for staff training purposes.

13. Clients Rights

A client has the right to request a copy of all the information the Company holds of them. A fee might be charged for excessive or unreasonable requests (similar requests are made repeatedly within a short period, or if fulfilling the request would require disproportionate administrative resources).. A client also has the right to have any inaccuracies corrected, the right to object to the use of their data, delete personal data and the right to block any specific uses of their data by the Company by means of a request in writing to the customer service team at contact@xelansmarkets.com

- **Right to access personal data:** You may access your personal data (including a copy of your personal data undergoing processing) on request, subject to adherence to any relevant legal requirements that may prevent us from doing so or if other exemptions apply. You will be required to prove your identity and provide us with sufficient information evidencing your interaction with us so that we can locate any relevant data.
- **Right to correct and delete personal data:** You may request to correct, amend or delete your personal data if it is inaccurate or requires updating. The deletion of your personal data will result in the automatic closure of your account and your data will cease to be used for active processing. This will also result in your inability to access our platform. Though your data may be deleted we are required to maintain your personal data in compliance with legal and regulatory requirements for specified periods and in accordance with our internal policies in relation to maintaining records.
- **Right to restrict data processing:** If you would like to control the use of your information for direct marketing purposes, you may do so by managing the type of communication you would to receive (email, SMS, push notification) via the "Notification Settings" under the "Settings" tab on the platform.

14. Data Retention

Your data will be retained only for the use for the purpose for which it is obtained and for the period for which it is required for business and legal purposes. The data will be retained for the minimum prescribed period with regard to applicable laws, contractual obligations, and the expectations and requirements of our clients. The data will be destroyed or deleted responsibly and securely.

15. Changes to This Privacy Statement

The Company may from time-to-time revise and update this Privacy Statement and will promptly share the new version by email to inform all clients of the change. The client agrees to accept the email of a revised Privacy Statement as actual notice to them. Any dispute over the Company's Privacy Statement is subject to this notice and the Company's Terms and Conditions. The Company encourages clients to periodically review this privacy statement so that they are aware of the information the Company collects, how it uses it and to whom else it might be disclosed. If a client has any questions that this Privacy Statement does not address, they should contact a Customer Services representative of the Company.