

PRIVACY POLICY

Introduction

- 1.1. Fxanalyzer.com (hereinafter referred to as “we”, “us”, “our” or “Company”) is a company registered in Sweden providing Advertising.
- 1.2. This Privacy Policy (hereinafter referred to as the “Privacy Policy”) is issued pursuant to and reflects compliance with the requirements and/or obligations and/or duties introduced by the EU General Data Protection Regulation 2016/679 (hereinafter referred to as the “GDPR”), as amended and replaced from time to time, the e-privacy Directive 2002/58/EC as amended and replaced by the Directive 2009/136/EC, as amended and replaced from time to time, their implementing legislations and the Sweden Law on Data Protection, as amended and replaced from time to time (hereinafter collectively referred to as the “Data Protection Laws”), in regards with any and all Personal Data or Information (hereinafter referred to as the “Personal Data” or “Data”) processing activities carried out by the Company.
- 1.3. The Company’s principal address is Fxanalyzer.com, POSTBOX 258, 21422 Malmö- SWEDEN.
Our Contact details may be found on www.fxanalyzer.com/contact-us

2. Scope and Objective of the Privacy Policy

- 2.1. The Company respects individuals’ rights to privacy and the protection of Personal Data. The scope of this Privacy Policy is to explain and elaborate on how we, as a Data Controller, collect, use, process and store Personal Data in the course of our business.
- 2.2. “Personal Data” means any information relating to an identified or identifiable natural person (‘data subject’); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person.
- 2.3. The Company reserves the right to update and change this Privacy Policy from time to time, for example, in order to reflect any changes to the way in which we process your Personal Data or changing legal requirements. In case of any such changes, we will post the amended Privacy Policy on our website or publish it otherwise. The changes will take effect as soon as they are posted on our website. Please note that if you do not agree to such changes of processing your Data, we may have to suspend the services and/or products provided to you.
- 2.4. If you have any questions about this Policy, please contact us at info@fxanalyzer.com or +46 762 15 78 67 or at our office address: Postbox 258
Malmö 214 28

3. Personal Data we process

3.1. We collect, use and process various categories of Personal Data at the start of, and for the duration of, your business relationship with us. The Company will limit the collection and processing of Personal Data to the necessary Data to meet the purpose and legal basis as described in the Section 5 of this Privacy Policy.

3.2. Personal Data may inter alia, include:

a. Basic Personal Data, including but not limited to name, residential address, email address, telephone number;

b. Online profile and social media information and activity based on your interaction with us, our websites and applications including but not limited to login information, Internet Protocol (IP) address, smart device information, location coordinates, mobile phone network information, searches and site visits.

4. How Personal Data is collected

4.1. Your Personal Data is collected:

a. From you;

b. From third parties – including subsidiaries or sister companies of the Company, third parties who provide services to you or us, established or located within and/or outside the EEA;

c. Credit reference and fraud prevention agencies, banks or other financial institutions, third authentication service providers and the providers of public registers;

d. During our business relationship with you;

e. From the technology that you use to access our services including location data from your mobile phone, or an IP address or telephone number and how you use it;

f. From publicly available sources including the press, company registers and online search engines whatsoever.

4.2. It is your duty and responsibility to provide us with updates as to the Personal Data provided in order for such Data to remain current, accurate and correct and you acknowledge that we rely on the Personal Data provided to us in carrying out our obligations, under the law and our business relationship with you.

4.3. Where you are a non-physical person providing to us Personal Data of any other individual or where you are an individual providing us with Personal Data of any individual other than yourself, you hereby undertake and represent that such individual, whose Personal Data is collected, used, processed and stored in accordance with this Privacy Policy, has been fully informed of and clearly consented in writing to such collection, use, processing and store of his/her Personal Data under this Privacy Policy and that

he/she has been informed of his/her rights in relation to the Personal Data which is collected, used, processed and stored, under this Privacy Policy.

5. Purpose of Processing and legal basis of processing of your Personal Data

5.1. Purpose of processing

5.1.1. We will only collect, use, process, store, share or transfer your Personal Data where it is necessary for us to carry out our lawful business activities and provide our services and/or products.

5.1.2. Please note that if you don't agree to provide us with the Data outlined below, we may have to suspend the services and/or products provided to you.

5.2. Legal Basis of processing of your Personal Data

5.2.1. Performance of a Contract/Contractual necessity

We may process your Personal Data where it is necessary to enter into a contract with you for the provision of our products or services or to perform our obligations or duties under such contract. We may further process your Personal Data where you have expressed your interest in being contacted by another company for the provision of services / information (i.e. when you have completed your details on a landing page of a company advertised in the Company's website, or when you have provided all details to the Company providing your express consent for those to be transmitted to companies providing services you are interested into, etc.)

The Data that may be collected, used, processed and stored on the basis of contractual necessity, include, non-exhaustively, the customer's name, IP address and email.

5.2.2 Legal and Regulatory Obligations When you register for a product or service and throughout your relationship with us, we are required by the law to collect, use, process and store certain Personal Data about you.

This may include Personal Data necessary:

- a. To comply with any and all legal or regulatory obligations whatsoever under the laws and regulations, in any jurisdiction within or outside the EEA;
- b. To be used in the courts, law enforcement agencies, regulatory agencies, and other public or competent or tax authorities or other authorities, governmental or not, in any jurisdiction within or outside the EEA;
- c. To carry out checks in relation to anti-money laundering and terrorist financing, bribery, fraud, and/or sanctions whatsoever as required by the laws and regulations;
- d. To protect our rights, privacy, safety or property whatsoever;
- e. To be used for the prevention, detection or investigation of crimes whatsoever.

The Data that may be collected, used, processed and stored on the basis of legal or regulatory obligations of the Company, include, non-exhaustively, the customer's name and any telephone recordings/telephone verification between you and the Company or Company's employees, associates, whatsoever, in regards with the provision of services or enquiries or complaints or support or verification whatsoever (where applicable).

5.2.3 Legitimate interests of the Company

We may collect, process, use, and store your Personal Data where it is in our legitimate interests and without prejudicing your interests or fundamental rights and freedoms.

We may process your Personal Data to manage our business, financial affairs as well as to protect our employees, Clients and property. It is in our interests to ensure that our processes and systems operate effectively and that we can continue operating as a business.

It is also in the Company's interest to ensure that it provides you with the most appropriate products and services. This may require processing of your Data to enable us to:

- a. Understand your actions, behavior, preferences, expectations and feedback in order to improve our products and services, develop new products, new business opportunities and services, and to improve the relevance of products and services offered;
- b. Monitor and improve the performance and effectiveness of products and services.

The Data that may be collected, used, processed and stored on the basis of legitimate interest of the Company include, non-exhaustively the customer's country of location and telephone number, email, fax (only for the purposes of the Section 9 of this Privacy Policy).

5.2.4 Consent

For special category of data as well as for research, statistical or business development, educational or marketing purposes we may only collect, use, process and store Personal Data where an explicit consent has been granted.

The Data that may be collected, used, processed and stored on the basis of consent, include non-exhaustively, your telephone number.

6. Your rights

6.1. You, as a customer, have several rights in regards with all Personal Data we collect, process, use and store.

These rights include:

- a. Obtaining information regarding the processing of your Personal Data and access to the Personal

Data that we hold about you. Please note that there may be circumstances in which we are entitled to refuse requests for access to copies of Personal Data, (in particular, information that is subject to legal professional privilege);

- b. Requesting that we correct your Personal Data if it is inaccurate or incomplete;
- c. Requesting that we erase your Personal Data in certain circumstances. Please note that there may be circumstances where you ask us to erase your Personal Data, but we are legally entitled to retain it;
- d. Objecting to, and requesting that we restrict, our processing of your Personal Data in certain circumstances. Again, there may be circumstances where you object to, or ask us to restrict, our processing of your Personal Data but we are legally entitled to refuse that request;
- e. Objecting to the collection, use, processing or storing of your Personal Data for direct marketing purposes, including profiling you for the purposes of direct marketing.
- f. Withdrawing your consent, although in certain circumstances it may be lawful for us to continue processing without your consent if we have another legitimate reason (other than consent) for doing so.

6.2. In the event you wish to exercise any of the rights described above or if you have any queries about how we collect, use, process or store your Personal Data that are not answered in this Privacy Policy, or if you wish to complain to the Company, please contact us at info@fxanalyzer.com or at +46 762 15 78 67 or at our office address: Postbox 258 Malmö 214 28

6.3. Please note that in some cases, if you do not agree to the way we collect, use, process or store your Personal Data, it may not be possible for us to continue providing you with our services and/or products and as a result such provision of services and/or products will be suspended.

7. How we use and share your Personal Data with and in what circumstances

7.1. We will only use and share your Personal Data where it is necessary for us to lawfully carry out our business activities and/or provide our services. Your Personal Data may be shared with and used, processed and stored by subsidiaries and/or other group companies, always on a confidential basis and as allowed by applicable law.

7.2. We may also share your Personal Data with others outside the Company or any of its subsidiaries or group companies, within or outside of the EEA, always on a confidential basis and as allowed by applicable law, in the following circumstances:

- a. **Where we have your explicit and written consent.**

Under this category, Personal Data will be usually disclosed to the Company's third-party clients,

stakeholders and partners who, acting as independent data controllers, disseminate commercial communications via the internet, post, email, phone. These third parties (the updated list of which is always available upon request from the Company) are those advertised in our website and you might have expressed interest either on the specific company and their specific services and/or products by clicking on or completing any of their banners in our website or in general on a service and/or product that is provided by them and we believe it is for your benefit that we provide them your Personal Data. Such transmission will always be subject to your consent and on a confidentiality basis. It is noted that in the aforementioned case, the Personal Data that will be shared will be restricted to the customer's name, country of location, email and telephone number;

b. It is required for your product or service;

c. Where it is requested by any regulatory authority having control or jurisdiction over the Company or you or your associates whatsoever or in whose territory the Company has Clients;

d. With competent authorities to investigate or prevent fraud, money laundering or other illegal activity;

e. With credit reference and fraud prevention agencies, third authentication service providers, banks and other financial institutions for credit checking, fraud prevention, anti-money laundering purposes, identification or due diligence checks of the Client;

f. With any of the Company's professional advisors provided that in each case the relevant professional shall be informed about the confidential nature of such Data and commit to the confidentiality obligations herein as well;

g. With other service providers who create, maintain or process databases (whether electronic or not), offer record keeping services, email transmission services, messaging services or similar services which aim to assist the Company collect, storage, process and use your Personal Data or get in touch with you;

h. Market research organizations that provide telephone or email surveys with the purpose to improve the services of the Company, in accordance with the Section 5.2.4. In such cases only the contact details will be provided;

i. With successors or assignees or transferees or buyers, with five (5) business days prior written notice to you;

j. With such third parties as we see fit to assist us in enforcing our legal or contractual rights against you are including but not limited to debt collection agencies and legal advisors. You acknowledge that any of the persons listed in the previous sentence may be either within or outside the EEA;

k. It is required by the law and by law enforcement agencies, judicial bodies, government entities, tax authorities or regulatory bodies and/or other competent authorities, governmental or not, whatsoever, established or located within or outside the EEA;

l. With internal and external auditors whatsoever.

7.3. Our third-parties to which we share and/or transfer your Personal Data are not allowed to use or disclose or share whatsoever for any other purpose other than the purpose to provide services, as agreed, to us.

7.4. We will not disclose to any third party your Personal Data for its own marketing purposes without your consent.

7.5. Please note that your Personal Data is shared, transferred, collected, processed and stored in the following countries (EEA and non-EEA)

7.6. If you would like a copy of your Personal Data held by the third parties or if you want to receive more details on how your Personal Data is collected, used, processed or stored by the third parties please contact us at info@fxanalyzer.com or at +46 762 15 78 67 or at our office address: Postbox 258
Malmö 214 28

7.7. We may share or transfer your Personal Data to organizations including Company's subsidiaries or group companies in other countries only if we ensure that such organizations maintain the same or equivalent Personal Data protective measures in accordance with the Laws.

7.8. In the event that we share or disclose Personal Data to countries outside of the EEA we will only do so where:

a. the European Commission has decided that the country or the organization we are sharing your Personal Data with will protect your Data adequately;

b. the transfer has been authorized by the relevant data protection authority;

c. we have entered into a contract with the organization with which we are sharing your Personal Data (on terms approved by the European Commission) to ensure your Personal Data is adequately protected.

8. Marketing communications

8.1. We will not contact you at your telephone number or via email and/or by any other means to provide you with information about our services or products offered by the Company or to provide you

with any other marketing material, unless you expressly instruct us to do so (opted -in), or unless we are permitted under the Data Protection Laws to do so.

8.2. You may unsubscribe/opt-out anytime by clicking the unsubscribe/opt-out link located on our electronic commercial information or by written request at info@fxanalyzer.com or at our office address: Postbox 258
Malmö 214 28

9. Monitoring of calls, emails, text messages and other communication

We may monitor or record calls, emails, text messages or other communications in accordance with the Laws as described in the Section 5 of this Privacy Policy. Such recordings may comprise conclusive evidence of the instructions and/or requests or conversations. You have the right to request, and the Company upon such request, provide you with such records as described in the Section 7 of this Privacy Policy.

10. How long we store your Data

We will store your Personal Data for as long as it is required for legal or business purposes. Retention periods may be extended if we are required to preserve your Personal Data in connection with litigation, investigations and proceedings. When your Personal Data is not needed, we securely delete or destroy it.

11. Security information

We are committed to ensuring that your Personal Data is secure with us and with the third parties who act on our behalf. For more information about the steps we are taking to protect your Personal Data please contact us at info@fxanalyzer.com or at +46 762 15 78 67 or at our office address: Postbox 258
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12. Cookie Policy

Cookies are pieces of data that a website stores on your computer or any other electronic device when you visit a website to enable you to perform numerous functions on the website as well as to regulate the content to your preferences. As a result, the Company uses cookies to ensure that the performance and the functionality of its website is robust and enhanced.