### PELICAN EXCHANGE PRIVACY POLICY

This Privacy Policy explains how and why any information that we obtain from you, or that you provide to us, will be collected, used and disclosed by us in connection with your use of the Pelican Exchange website at www.pelicanexchange.com ('Site') and/or the Pelican Exchange mobile application ("App"), available from iTunes-Apple (UK) or Google Play for downloading or streaming onto your smartphone, tablet computer or other handheld mobile device ('Device').

In this Privacy Policy, the terms 'we', 'us', or 'our' refer to Pelican Exchange Limited, a company incorporated in England and Wales with company number 9285310 and whose registered office address is at Springwood Cottage, Summer Lane, Milford, Surrey, GU8 5AD, United Kingdom. Our business address is Clifton Centre, 110 Clifton St, London EC2A 4HT, United Kingdom. Please read the following carefully to understand our views and practices regarding your personal data and how we will treat it. We are committed to protecting and respecting your privacy.

# Information we may collect from you

We may collect and process the following data about you:

• Information you give us. You may give us information about you by filling in forms on the Site/App, by using the service available to registered users of the Site/App ('Service') or by contacting us by phone, e-mail or otherwise. This includes information you provide when you register to use the Site/App, subscribe to the Service, post material on the Site/App, carry out transactions or make payments through the Site/App, report problems with the Site or App or carry out any other activities on the Site/App. The information you give us may include your name, address, e-mail address and phone number, financial and credit card information and other personal information.

• **Information we collect about you.** When you visit the Site or use the App we may automatically collect the following information:

• technical information, including the internet protocol ('IP') address used to connect with your computer or Device, your login information, browser type and version, time zone setting, browser plug-in types and versions, operating system, mobile network and platform;

 information that relates to your trading account, this information includes but is not limited to:

Login/account number.

Account's MT4 group name.

Account's Leverage

Account's financial information (Balance, Equity, Margin requirement...etc.)

Account's trading history

Account's open positions and working/pending orders.

The ability to verify the account's password. (check if the password you have is correct or not)

 information about your use of the Sites/App, including the full Uniform Resource Locators (URL) clickstream to, through and from the Site (including date and time); products you viewed or searched for; page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), and methods used to browse away from the page and any phone number used to call our customer service number.

• **Information we receive from other sources.** We may receive information about you from third parties we work with (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies).

# Uses made of the information

We use information held about you in the following ways:

• Information you give to us. We will use this information:

• to carry out our obligations arising from any contract entered into between you and us and to provide you with the information, products and services that you request from us;

 to provide you, or permit selected third parties to provide you, with information about goods or services we feel may interest you, where you have consented to this. If you want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please tick the relevant box situated on the form on which we collect your data;

• to notify you about changes to our Service; and

• to ensure that content available through the Site/App is presented in the most effective manner for you and for your computer.

• Information we collect about you. We will use this information:

• to administer our site and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;

 $^\circ$  to improve our site to ensure that content is presented in the most effective manner for you and for your computer/Device;

to allow you to participate in interactive features of our Service, when you choose to do so;
as part of our efforts to keep our site safe and secure;

 $^\circ$  to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you; and

 $^\circ$  to make suggestions and recommendations to you and other users of our site about goods or services that may interest you or them.

• **Information we receive from other sources.** We may combine this information with information you give to us and information we collect about you. We may use this information and the combined information for the purposes set out above (depending on the types of information we receive).

# **Disclosure of your information**

We may share your personal information with selected third parties including:

• Business partners, suppliers and sub-contractors where this is necessary for the performance of any contract we enter into with you;

• Advertisers and advertising networks that require the data to select and serve relevant adverts to you and others;

• Analytics and search engine providers that assist us in the improvement and optimisation of our Site/App; and

• Credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.

We may disclose your personal information to third parties:

• If we or substantially all of our assets are acquired by a third party, in which case personal data held by it about our customers will be one of the transferred assets; and

• If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply any agreements between you; or to protect the rights, property, or safety of us, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

#### Where we store your personal data

The information about you that you give us or that we collect from you may be transferred to, and stored at, a country outside the European Economic Area ("EEA"), and it may also be processed by staff operating in a country outside the EEA who work for us or for one of our suppliers, but only where the country in question ensures an adequate level of protection or the transferee has provided appropriate safeguards. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

# Passwords

Where we have given you (or where you have chosen) a password which enables you to access certain parts of our Site/App, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

# Security

We follow generally accepted industry standards to protect the personal information submitted to us, both during transmission and once we receive it. Unfortunately, the transmission of information via the internet or through telecommunications networks is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our Site/App, and any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

### Your rights

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us at 1 Paris Garden, SE1 8ND or by email to support@pelicanexchange.com.

### Links to other sites

Our Site and App may, from time to time, contain links to and from the websites of our partner networks, advertisers and affiliates. If you follow a link to any of these websites, please note that these websites have their own privacy policies and that we do not accept any responsibility or liability for these policies. Please check these policies before you submit any personal data to these websites.

### Access to your information

The Act gives you the right to access information held about you. Your right of access can be exercised in accordance with the Act. Any access request may be subject to a fee to meet our costs in providing you with details of the information we hold about you.

### Changes to our privacy policy

Any changes we may make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

### Contact

Questions, comments and requests regarding this privacy policy are welcomed and should be addressed to support@pelicanexchange.com.