

PRIVACY POLICY

1. Introduction:

We respect the privacy of everyone who visits this website. We recommend you read this Privacy Policy so that you understand our approach towards the use of your Personal Information, when and with whom we will share it and how we will keep it safe. This Privacy Policy forms part of our website Terms and Conditions of Use and such shall be governed by and construed in accordance with the laws of South Africa.

We reserve the right to make changes to this Privacy Policy from time to time and in response to changing legal, regulatory or operational requirements, and as such any personal information that we may hold will be governed by the Privacy Policy at the given time. Your continued use of the Xignal service after such updates take effect will constitute your acknowledgment and acceptance of those changes.

Please note that this Privacy Policy is addressed to subscribers and potential subscribers. Our website and/or service is not for users outside of South Africa and may not be distributed for use outside South Africa.

Any reference to 'us', 'our', 'we' or 'Xignal' in this Privacy Policy is a reference to Xignal Trading (Pty) Ltd (Registration Number: 2021/784271/07) and which shall include any related company or entity, as the context requires unless otherwise stated.

Any reference to 'you', 'your', 'yours' or 'yourself' in this Privacy Policy is a reference to any of our subscribers or potential subscribers as the context requires unless stated otherwise.

By using this website, you acknowledge that you have reviewed the terms of this Privacy Policy and agree that we may collect, use and transfer your Personal Information in accordance therewith.

2. Collection of Information:

We receive and store personal data from our subscribers and potential subscribers that include the following:

2.1. Information you provide to us:

We collect the information you provide to us which includes:

- Name, surname and contact details;
- Identity number and gender;
- Debit or credit card details;

- Bank account detail;
- Physical address;
- Email Address;
- Telephone number.

Should the subscriber be a company, trust or close corporation, we collect the information you provide to us which includes:

- Company/trust/CC Name;
- Registration number;
- Registered Address;
- Email address and telephone number;
- Person responsible for managing the subscription;
- The directors/trustees/members' names and identity numbers;
- VAT number;
- Bank account details;
- Debit or credit card details.

2.2. Information we collect automatically:

We collect information about you and your use of our services and website, subscription application, demo sign up forms, webinar forms, website cookies, information provided to us during your interactions with us and in the course of our ongoing relationship.

We may record any communications and/or interactions that we have with you in relation to the services we provide you and our relationship with you, the recordings of which shall remain the sole property of Xignal. Such recordings may be recorded without the use of a warning or any other future notice.

2.3. Information from Partners:

We may collect information from other companies with whom you have a relationship ("Partners"). These Partners may include FxPro™ or other forex trading platforms who make use of our services.

2.4. Information from other sources:

We may also obtain information from other sources. We protect this information according to the practices described in this Privacy Policy, together with any additional restrictions imposed by the source of the data. These sources may vary over time but may include, but not be limited to:

- Security service providers who provide us with information to secure our systems, prevent fraud and help us protect the security of our accounts;
- Payment service providers who provide us with payment or balance information, or updates to that information;
- Online and offline data providers, from which we obtain interest based and online advertising related data;
- Publicly available sources such as social media platforms and information available through public databases.

3. Use of information:

We use information to provide, analyse, administer, enhance and personalize our service and marketing efforts, to manage subscriber referrals, to process your subscription registration, your payments, invoicing and to communicate with you.

We also use information to:

- Secure our systems, prevent fraud and help us protect the security of Xignal accounts;
- Prevent, detect and investigate potentially prohibited or illegal activities;
- Communicate with you regarding our service.

We may process your personal information for one or more of the lawful bases of processing, depending on the specific purpose for which we are using your data. Such lawful basis may include:

- To perform our contractual obligations to you;
- To be compliant with the legal and regulatory requirements;
- To pursue our legitimate interests.

Where our use of your personal information does not fall within one of the above lawful basis, we require your consent, which shall be given freely by you and you shall have the right to withdraw your consent at any time by contacting us.

We may use personal information provided by you through our website as well as personal information provided by you during our business relationship to communicate with you, for the purpose of the service offering, market news or analytical reports.

4. Disclosure of Information:

We may disclose your information for certain purposes and to third parties as described below:

- Other companies within the Xignal group who provide financial or other services;
- Any service providers and specialist advisors who have been contracted to provide us with services such as administrative, IT, financial, regulatory, compliance, research, insurance, marketing, or any other service;
- Introducing affiliates and/or brokers with whom we have a mutual relationship;
- Payment service providers and banks processing your subscription through the use of credit/debit card transactions or other payment methods;
- Any auditing, accounting or legal contractors or advisors assisting us with our business purposes;
- Courts, tribunals and applicable regulatory authorities as agreed or authorized by law or our agreement with you;
- Government bodies and law enforcement agencies where required by law and in response to other legal and regulatory requests;
- Any third party where such disclosure is required in order to enforce and apply our Terms of Use or other relevant agreements required to subscribe to our service;
- Anyone authorized by you.

Only the minimum data required from any of these third parties to perform their obligations to us will be provided. Our third party providers are not permitted to share or use personal information we have provided to them for any other purpose other than to provide us with the services enlisted from them.

Any external third party website, that may or may not be linked to this website, will not be covered by this Privacy Policy and those sites are not subject to our privacy standards.

5. Your Rights:

You may request access to your personal information, or correct or update out-of-date or inaccurate personal information we hold about you, at any time. You may also request that we delete any personal information that we hold about you.

6. Security:

We are committed to safeguarding and protecting your personal information and will implement and maintain appropriate technical and organizational measures to ensure a level of security appropriate to the risks of processing your personal information.

We hold personal information in secure computer storage facilities and have taken the necessary steps to protect the personal information we hold from misuse, disclosure and unauthorized access.

When we consider that personal information is no longer needed, we will remove any details that will identify you or we will securely destroy the records.

7. FxPro™:

The FxPro™ Account that you register using our account management system will at all times be subject to the privacy policy as regulated by FxPro™.

8. Cookies:

We use cookies to store and collect information about your use of our website.

Cookies are small data files that are commonly stored on your device when you browse and use websites and online services. They send information stored on them back to our web server when you access our website. In many cases, declining cookies will impair the effectiveness of web beacons associated with those cookies.

Our essential cookies are strictly necessary to provide our website or online service, which may use these cookies to authenticate and identify our subscriber when they use our website so that we can provide our service to them.