

## PRIVACY NOTICE

As part of our day-to-day business we need to collect personal information from our customers and potential customers to ensure that we can meet their needs for a range of financial services and provide them with information about our services.

Your privacy is important to us and it is our policy to respect the confidentiality of information and the privacy of individuals. You should read this privacy notice carefully as it contains important information about how we manage your personal information supplied to us by you or a third party in connection with our provision of services to you or which we collect from your use of our services and/or our app(s) or website(s). It also details your rights in respect of our processing of your personal information. Such information may be considered to be 'personal data' protected under the Personal Data Protection Act 2012 (the 'PDPA' or 'Act').

Any reference to 'us', 'our', 'we' or 'IG' in this privacy notice is a reference to IG Asia Pte Ltd as the context requires, unless otherwise stated.

Similarly, any reference to 'you', 'your', 'yours' or 'yourself' in this privacy notice is a reference to any of our customers and potential customers as the context requires, unless otherwise stated.

#### UPDATES TO THE PRIVACY NOTICE

Our Privacy Notice will be reviewed from time to time to take account of amendments to the Act, any other applicable new laws and technology, changes to our operations and practices and to make sure it remains appropriate to the changing environment.

If we change our Privacy Notice, we will post the changes on our website, so that you are aware of the information we collect and how we use it. Changes to our Privacy Notice shall apply from the time that we post the same on this website. Your continued business relationship with us or use of our website will be taken as acceptance of the updated Privacy Notice, but we will seek your fresh consent before we collect more personal data from you or we wish to use or disclose your personal data for new purposes.

Any personal data we hold will be governed by the most current Privacy Notice.

## CONTACT US

If you any comments or questions about this Privacy Notice, please contact us in writing at the address below referencing 'Privacy Notice':

 Attention of:
 Data Protection Officer

 Phone:
 +65 6390 5118

 E-mail:
 helpdesk@ig.com.sg

 Mail:
 IG Asia Pte Ltd, 9 Battery Road, #01-02, MYP Centre Singapore 049910

#### PURPOSE OF COLLECTION OF PERSONAL DATA

As a customer of IG, we will need you to provide us with information about yourself and/or relating to any of your account(s). Your information may also be collected or compiled in the ordinary course of the relationship between us.

#### TYPES OF PERSONAL DATA

Because of the nature of the products and services provided and pursuant to applicable Singapore laws and regulations, we ask for and collect a range of personal data from actual or potential customers.

Generally, we collect personal data that is linked to an individual. For example, an individual's name, identification number, residential address, date of birth, gender, location data, nationality, phone number and email address, income and wealth details, savings and net-worth, education, employment, tax and financial statements, account balances and trading experience and performance. This is not an exhaustive list and we may collect other types of personal data from you.

Apart from personal data, we may collect other types of information which is not linked to an individual and which is anonymous. For example, the number of website visitors and the number of website users using a particular service. In this way, we hope to improve our customer services.

We obtain most of the data directly from our customers through application or other forms, and from maintaining records of data provided in the course of ongoing customer service or visits to our websites (including www.dailyfx.com) or our apps or through the use of cookies on our websites and/or apps, in particular by recording which pages you look at on our website(s). We may also obtain data from other sources.

We may ask for other data voluntarily from time to time (for example, through market research, surveys or special offers) to enable us to improve our service or consider the wider needs of our customers or potential customers.

We also keep records of your trading behaviour, including a record of:

- products you trade with us and their performance;
- products we trade on your behalf and their performance;
- historical data about the trades and investments you have made including the amount invested; and
- your preference for certain types of products and services.

We may record any communications, electronic, by telephone, in person or otherwise, that we have with you in relation to the services we provide to you and our relationship with you. These recordings will be our sole property and will constitute evidence of the communications between us. Such telephone conversations may be recorded without the use of a warning tone or any other further notice.

Further, if you visit any of our offices or premises, we may have CCTV, which will record your image.

# USE, DISCLOSURE AND/OR PROCESSING OF PERSONAL DATA

We may use, disclose and/or process your personal data for any of the following purposes:

- account opening, and operations relating to your account including closing your account;
- providing services and facilities to you from time to time including for the effective execution of any of your transactions;
- administration and/or managing the relationship between us and/or your account;
- introducing brokers with whom we have a mutual relationship;
- conducting credit checks;
- carrying out due diligence or other screening activities (including identity, reference and background checks) in accordance with legal or regulatory obligations or our internal risk management procedures (including but not limited to those designed to combat financial crime, 'know-your-customer', anti-money laundering, counter-terrorist financing or anti-bribery) that may be required by law or that may have been put in place by us;
- enhancing our customer service or developing new services and / or products from time to time;
- processing any applications or requests for new services and / or products made by you;
- training our employees;
- delivering online or e-mail advertising and commercial messages that may be of interest to you under any direct marketing activities undertaken by us;
- risk management, capital management, financial accounting and management reporting purposes;
- enforcing our legal and/or contractual rights against you including but not limited to legal advisers and debt collection agencies;
- where we are required to disclose your personal data by law or when we deem reasonably necessary in order to prevent financial crime or to give effect to the laws governing the relationship between us and/or your account; and

## USE, DISCLOSURE AND/OR PROCESSING OF PERSONAL DATA (CONTINUED)

 to relevant local or foreign regulatory authorities, government agencies, statutory boards, supervisory bodies, dispute resolution centres or revenue authorities, including but not limited to the Monetary Authority of Singapore, the Financial Industry Disputes Resolution Centre Ltd, the UK Financial Conduct Authority, any relevant securities or futures exchanges, clearing houses, trade repositories, self-regulatory organizations, alternative trading systems or multilateral trading systems.

We will not use, disclose and/or process your personal data for purposes which are not stated above. Should we wish to use, disclose and/or process your personal data for a new purpose, we will notify you and seek your prior consent.

Where necessary, we may disclose your personal data to third party service providers and agents (including lawyers/law firms), who may be either within or outside of Singapore for any of the purposes listed above only. We will not disclose your personal data for purposes for which we have not obtained consent.

Generally, we require that organisations outside the IG Group of companies who handle or obtain personal data as third party service providers and agents to acknowledge the confidentiality of the personal data, undertake to respect an individual's right to privacy and comply with the Act and this Privacy Notice.

#### TRANSFER OF PERSONAL DATA OVERSEAS

In certain circumstances, we may need to transfer your personal data outside of Singapore. Any such transfer of your personal data outside of Singapore will be carried out in accordance with the PDPA.

You acknowledge and consent to the transfer of your personal data to other companies within IG Group (for information on IG Group, visit our website at www.iggroup.com) as well as third party service providers and agents (including lawyers/law firms) outside of Singapore for one or more of the purposes described above.

You are entitled to request details of such transfer from us at any time.

#### CONSENT

Generally, when we request for personal data in the course of providing you a service and/or product and you provide us with such personal data, there is implied consent that you agree to provide us with personal data in order for us to provide you with the requested service and/or product.

In some circumstances and as required by applicable laws, we will seek your express consent when collecting your personal data. For example, where there are new purposes for the use of your personal data, we will seek your fresh consent.

If you do not consent to provide the requisite personal data that we need at the point of application or in the course of maintaining your account(s) with us, we may not be able to open account(s) for you or provide the specific service or product that you require. You are entitled to withdraw your consent for the collection of personal data by contacting us. However, this may affect our ability to maintain your account(s) with us.

#### SITUATIONS NOT REQUIRING CONSENT

We will not sell, rent or otherwise disclose your personal data to any third party, without your consent except in the following circumstances:

- we may share non-personal, non-individual information in aggregate form with third parties for business purposes or we may tell our business partners the number of customers in certain demographic groups or who carried out certain transactions; and/or
- as permitted under the laws of Singapore.

#### MARKETING OUR PRODUCTS AND SERVICES

We may use your personal data to let you know about our new products and services that we may launch or to provide information on promotions, events, campaigns or other opportunities in which you may be interested in. If you no longer wish to receive such marketing communications please contact us.

#### ACCESS AND CORRECTION

Under the Act, you have the right to obtain a copy of any personal data which we hold about you and to advise us of any inaccuracy that requires a correction. In addition, you are entitled to know how your personal data has been used or disclosed in the past one year.

The Act does set out some exceptions to this. For instance, where the amount of effort and resources needed to provide access would be unreasonable or disproportionate to your interests or if we have satisfied ourselves on reasonable grounds that the correction should not be made.

To make a request, you will need to complete an application form verifying your identity and specifying what data you require. We may charge a reasonable administrative fee for this service to cover the cost of verifying the application and locating, retrieving, reviewing and copying any material requested. If the personal data sought is extensive, we will advise the likely cost in advance and can help to refine your request if required.

We will acknowledge your request within 30-days and respond promptly to it. In exceptional circumstances, we reserve the right to deny you access to your personal data and may provide an explanation as required by applicable laws.

## MANAGEMENT OF PERSONAL DATA

We train our employees who handle personal data to respect the confidentiality of customer data and the privacy of individuals. We regard breaches of your privacy very seriously and will impose appropriate penalties, including dismissal.

#### STORAGE AND RETENTION

Safeguarding the privacy of your personal data is important to us, whether you interact with us personally, by phone, by mail, over the internet or other electronic medium. We hold personal data in a combination of secure computer storage facilities and paper-based files and other records, and take steps to protect the personal data we hold from misuse, loss, unauthorised access, modification or disclosure.

We may need to maintain records containing personal data for a significant period of time, as long as it is necessary to fulfil the purpose for which it was collected, or as required or permitted by applicable laws. We shall cease to retain personal data, or remove the means by which the personal data can be associated with particular individuals, as soon as it is reasonable to assume that the purpose for which that personal data was collected is no longer being served by retention of the personal data and retention is no longer necessary for legal or business purposes. Destruction of records with personal data will be done in a secure manner.

#### ACCURACY

In order to ensure that your personal data is current, complete and accurate, please update us by contacting us in person at our office or by phone or through mail or e-mail.

We endeavour to ensure that the personal data we hold is accurate and up-to date. We realise that certain data that we hold about individuals changes more frequently, for example residential address, phone number and email address, income, savings and net-worth, etc.

We can generally update your personal data over the telephone or at our discretion, will require relevant and reliable documents to verify the amendment(s) that you request.

#### SECURITY SAFEGUARDS

We have put in place effective security procedures and technical and organisational measures to safeguard your personal data. We will use all reasonable efforts to safeguard your personal data. However, you should be aware that the use of the Internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data which is transferred from you or to you via the Internet.

## PREVAILING TERMS

In the event of inconsistency between the terms and conditions in our Margin Trading Customer Agreement and this Privacy Notice, the terms and conditions in our Margin Trading Customer Agreement shall prevail.

#### **GOVERNING LAW**

Note that as we are a Singapore registered company, this Privacy Notice has been drafted solely in accordance with the laws of Singapore. We do not represent or warrant that this Privacy Notice complies with the privacy laws of any other jurisdiction and accordingly, you shall not construe this Privacy Notice as such.

#### COOKIES ON IG SITES

#### WHAT IS A COOKIE AND HOW DO WE USE COOKIES?

A cookie is a small pieces of text stored on your computer or device when you visit a website or an app.

We use cookies on our websites or our apps to provide you with a more relevant and effective experience, including presenting web pages according to your needs or preferences. For further information about cookies and how we use cookies, please refer to our website

## COOKIES ON IG SITES (CONTINUED)

#### LINKS TO THIRD PARTY WEBSITES

Our websites or our apps may have links to external third party websites. Please note, however, that third party websites are not covered by this privacy notice and those sites are not subject to our privacy standards and procedures. Please check with each third party as to their privacy practices and procedures.

For more information about the cookies on this site, please visit our <u>managing your</u> <u>cookies page</u>.

## **TECHNOLOGY IMPROVEMENTS**

We are constantly striving to improve functionality on our website through technology changes. This may mean a change to the way in which personal data is collected or used. The impact of any technology changes which may affect your privacy will be notified in this Privacy Notice at the time of the change.

## DISCLAIMER

This website may have links to external third party websites. Please note that third party websites are not covered by our Privacy Notice. You are advised to read the privacy statement of each website that you visit, which collects personal data.

## ACCESS POLICY

- (1) This agreement will govern all dealings between IG ('we', 'us' and 'our' as appropriate) and the applicant customer ('you', 'your', 'yours' and 'yourself' as appropriate) during the application process. Once you open an account with us, your dealings with us will be governed by the applicable customer agreement for that account type.
- (2) In return for us granting you access to the Electronic Trading Services, you agree to the following terms.
- (3) For the purposes of this policy, 'Electronic Trading Services' means any electronic services (together with any related software or application) accessible by whatever means we grant you access to or make available to you either directly or through a third party service provider.
- (4) You will take all reasonable steps to ensure that no computer viruses, worms, software bombs or similar items are introduced into any computer hardware, software, applications, equipment or network facilities you use to access our Electronic Trading Services.
- (5) We and our licensors (as the case may be) will retain the intellectual property in all elements of the software and such software and databases contained within the Electronic Trading Services and you will not in any circumstances, obtain title or interest in such elements.
- (6) With respect to any market data or other information that we or any third party service provider provide to you in connection with your use of the Electronic Trading Services, (a) we and any such provider are not responsible or liable if any such data or information is inaccurate or incomplete in any respect; (b) we and any such provider are not responsible or liable for any actions that you take or do not take based on such data or information; (c) you will use such data or information is proprietary to us and any such provider and you will not retransmit, redistribute, publish, disclose or display in whole or in part such data or information to third parties except as required by applicable regulations or as agreed by us; (e) you will use such data or information solely in compliance with the Applicable regulations; and us any such provider and you will not retransmit, redistribute, publish, disclose or display in whole or in part such data or information to third parties except as required by applicable regulations or as agreed by us; (e) you will use such data or information solely in compliance with the Applicable at at any at our absolute discretion remove your access to market data at any time.
- (7) No one other than a party to this policy, their successors and permitted assignees shall have any right to enforce any of its terms.
- (8) This policy and all our dealings with you are in all respects governed by Singapore law, and the courts of Singapore will have non-exclusive jurisdiction to settle any disputes that may arise in relation thereto. Nothing in this term will prevent us from bringing proceedings against you in any other jurisdiction.

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