

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. This statement outlines our policy on how we manage the personal information we hold about our customers, potential customers, shareholders, suppliers and others. It applies to IG Limited as the data controller, with its registered office at Al Fattan Currency House Tower (2), Level 27, DIFC, Dubai, UAE.

It is our policy to respect the confidentiality of information and the privacy of individuals. We are bound by the DFSA rules and regulations and DIFC Law No. 5 of 2020, the Data Protection Law. This notice outlines 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.

Any reference to 'us', 'our', 'we' or 'IG' in this privacy notice is a reference to IG Limited 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, potential customers, shareholders, suppliers and others, as the context requires unless otherwise stated.

OUR PRIVACY POLICY IS BASED ON OPENNESS

We are committed to being open and transparent about how we use your personal information. Where our documents or interactions with you ask for personal information, we will generally state the purposes for its use and to whom it may be disclosed.

WHY DO WE COLLECT PERSONAL INFORMATION?

Our business is to meet our customers' needs for a range of financial services. To do this effectively, we need to collect certain personal information from our customers or potential customers, or from our suppliers that help us provide services on behalf of our business. Please also note that because of the nature of the services we provide and require, and our associated regulatory obligations we do not have the option of allowing you to deal with us on an anonymous basis.

The main reasons we need to process your personal data are:

- in order to perform our contractual obligations to you;
- in order to comply with our legal obligations, including in relation to client verification, anti-money laundering and other obligations we are subject to;
- in accordance with our legitimate business interests;
- in accordance with your consent, if we have requested consent for a specific purpose.

WHAT KIND OF PERSONAL INFORMATION DO WE ASK FOR?

Because of the nature of the products and services provided, government regulations and taxation laws (if applicable), we ask for a range of personal information from you.

The type of personal information we may collect from our customers can include (but is not limited to) name, address, date of birth, gender, contact details, income, assets and liabilities, account balances, trading statements, financial statements, credit reporting information, employment details, location data and any other similar information.

We obtain most of the information directly from our customers through application or other forms, and from maintaining records of information provided in the course of ongoing customer service. We may also obtain information from other sources. For example, credit information or identity checks.

The type of personal information we may collect from our suppliers can include (but is not limited to) names of authorised individuals acting on behalf of the suppliers, contact details, address and other similar information.

We may also obtain personal information about you through your use of our websites (including www.dailyfx.com), 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 ask for other information 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 may record any communications, electronic, by telephone, in person or otherwise, that we have with you in relation to the services we provide to or require from 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.

If you choose not to provide the information we need as a business or to fulfil your request for a specific product or service, we may not be able to provide you with the requested product or service, or we may not be able to do business with you as a supplier.

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.

HOW DO WE USE THIS INFORMATION AND WHO MAY WE DISCLOSE IT TO, INCLUDING CROSS BORDER DISCLOSURES

While we may send you marketing material from time to time that we think will be useful to you, we are conscious of the need to respect your privacy. Unless you are informed otherwise, the personal information we hold is used for establishing and managing your account, reviewing your ongoing needs, enhancing customer service and products and giving you ongoing information or opportunities that we believe may be relevant to you. We may also use your personal information for business planning purposes including product development and internal research.

Depending on the product or service concerned this means that personal information may be disclosed to:

- other companies within the IG Group (including associated companies in the United Kingdom and elsewhere in the world) who provide financial and other services for the IG Group and their clients;
- other service providers and specialist advisers who have been contracted to provide us with administrative, IT, financial, regulatory, compliance, insurance, research or other services;
- credit reporting or reference agencies;
- introducing brokers with whom we have a mutual relationship (any of whom may be within or outside UAE);
- credit providers, courts, tribunals and regulatory authorities as agreed or authorised by law or our agreement with you; and
- anyone authorised by you, as specified by you or our agreement with you.

Third party service providers such as credit-referencing agencies may keep a record of any searches performed on our behalf and may use the search details to assist other companies in performing their searches.

We may take reasonable steps to require that organisations both within and outside the IG group of companies who handle or obtain personal information as service providers to us acknowledge the confidentiality of this information, undertake to respect any individual's right to privacy and comply with the DIFC rules and DIFC Data Protection Law No. 5 of 2020, their local privacy regime as applicable, and this privacy notice.

We may transfer your personal information outside the DIFC to other IG Group companies as well as processors who are engaged on our behalf ("Transferees"). For example, currently we have other IG Group companies located in the USA, Singapore, Australia, Japan, China, India, South Africa, Switzerland and the UK. To the extent we transfer your information outside the DIFC, we will ensure that the transfer is lawful and that there are appropriate security and contractual arrangements in place to safeguard such transfers.

HOW DO WE USE THIS INFORMATION AND WHO MAY WE DISCLOSE IT TO, INCLUDING CROSS BORDER DISCLOSURES (CONTINUED)

In order to transfer personal information to third parties in territories that do not have a finding of adequacy by the applicable authority and regulations, we enter into agreements with the Transferees ensuring appropriate and suitable safeguards based on standard contractual terms adopted by the DIFC Commissioner of Data Protection. Where we make transfers to Transferees in the US, we may in some cases rely on applicable standard contractual clauses, binding corporate rules or any other equivalent applicable arrangements. If you would like a copy of such arrangements, please contact us using the contact details below.

We understand that you may choose not to disclose your personal information to us. However, please note that if you choose not to provide the information we need as a business or to fulfil your request for a specific product or service, we may not be able to provide you with the requested product or service or we may not be able to do business with you as a supplier.

UNSOLICITED INFORMATION

If you provide us with personal information that we have not requested then we will endeavour to only retain the information that we are otherwise entitled to hold because of the products and services we provide or require. However, if this additional information is surplus to our requirements but is provided to us in a manner where it is combined with information that we are either required or entitled to retain then you acknowledge that this unsolicited information may be held by us in the same manner as the balance of your personal information in accordance with this privacy notice.

MARKETING OUR PRODUCTS AND SERVICES

As noted above, we may use your personal information to let you know about products and services or promotions or other opportunities in which you may be interested. If you no longer wish to receive such communications please phone us on +971 (0)4 559 2100, or write to us at: IG Limited, Al Fattan Currency House Tower (2), Level 27, DIFC, Dubai, UAE, PO Box 506968 or email: helpdesk.ae@ig.com.

For marketing that you receive as a result of our use of cookies, please see the section dealing with cookies below. In particular please note the information about how to manage your preferences both personally and with any social media websites.

OUR WEBSITE(S), COOKIES AND TECHNOLOGY DEVELOPMENTS

This section outlines some privacy issues specific to our website(s) and app(s). We may collect personal information you enter when using our website or our apps. This includes the use of cookies.

WHAT IS A COOKIE AND HOW DO WE USE COOKIES?

We use cookies to give you access to certain pages of our website(s) or our app(s) without having to log in each time you visit. We may also use independent external service providers to track the traffic and usage on the website(s).

Cookies are small pieces of text stored on your computer to help us determine the type of browser and settings you are using, where you have been on the website(s) or the app(s), when you return, where you came from, and to ensure your information is secure. The purpose of this information is to provide you with a more relevant and effective experience on our website(s) or our app(s), including presenting web pages according to your needs or preferences.

MANAGING COOKIES AND MARKETING

Cookies are frequently used on many websites on the internet and you can choose if and how a cookie will be accepted by changing your preferences and options in your browser. You may not be able to access some parts of ig.com or our app(s) if you choose to disable the cookie acceptance in your browser, particularly the secure parts of the website. We therefore recommend you enable cookie acceptance to benefit from all the services on the website.

Please note that social media sites such as Twitter and Facebook will require you to manage your cookie preferences directly with them.

TECHNOLOGY DEVELOPMENTS

We are constantly striving to improve functionality on our website(s). This may mean a change to the way in which personal information is collected or used. The impact of any technology changes which may affect your privacy, will be notified in this privacy notice as it may be updated from time to time.

LINKS TO THIRD PARTY WEBSITES

Our website(s) or app(s) may have links to external third party websites that may benefit the user. Please note, however, that third party websites are not covered by our privacy notice and these sites are not subject to our privacy standards and procedures. Please check with each third party as to their privacy practices and procedures.

MANAGEMENT OF PERSONAL INFORMATION

We always take appropriate technical and organisational measures to ensure that your information is secure. In particular, we train our employees who handle personal information to respect the confidentiality of customer information and the privacy of individuals. We regard breaches of your privacy very seriously and will impose appropriate penalties, including dismissal where necessary.

We have appointed a Security Information Officer and a Data Protection Officer to ensure that our management of personal information is in accordance with this statement and the applicable legislation.

You can reach our Data Protection Officer at dpo-dubai@ig.com.

We have appointed a Security Information Officer to ensure that our management of personal information is in accordance with this statement and the applicable rules.

HOW DO WE STORE PERSONAL INFORMATION?

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

We will only retain your personal information for as long as necessary to fulfil the purposes we collected it for, including for the purpose of satisfying any legal, accounting, or reporting requirements. When we consider information is no longer needed, we will remove any details that will identify you or we will securely destroy the records.

However, we may need to maintain records for a significant period of time. For example, we are subject to certain anti-money laundering laws which require us to retain:

- a copy of the documents we used to comply with our customer due diligence obligations; and
- supporting evidence and records of transactions with you and your relationship with us,

for a period of six years after our business relationship with you has ended.

If we hold any personal information in the form of a recorded communication, by telephone, electronic, in person or otherwise, this information will be held in line with local regulatory requirements which will be either five years or ten years after our business relationship with you has ended.

Where you have opted out of receiving marketing communications we hold your details on our suppression list so that we know you do not want to receive these communications.

HOW DO WE STORE AND SECURE PERSONAL INFORMATION THAT IS HELD ELECTRONICALLY?

As information is more commonly held in electronic form we take our obligations to protect electronically held personal information very seriously. This includes ensuring we meet regulatory requirements regarding the appropriate levels of information and software security, governance and associated procedures.

HOW DO WE KEEP PERSONAL INFORMATION ACCURATE AND UP-TO-DATE?

We endeavour to ensure that the personal information we hold is accurate and up-to-date. We realise that this information changes frequently with changes of address and other personal circumstances. We can generally update your customer information over the telephone, by email from your registered email address or online via the electronic trading service.

YOUR RIGHTS

Under the DFSA rules and the DIFC Data Protection Law No. 5 of 2020, you have the following rights:

- Access to your data – request a copy of your personal information that we process about you;
- Rectify your data – request us to amend or update your personal information where it is inaccurate or incomplete;
- Erase your data – in certain circumstances set out in the DIFC Data Protection Law, you may request us to delete your personal information;
- Block your data – request us temporarily or permanently to stop processing all or some of your personal data;
- Withdraw your consent – withdraw your consent at any time to the use of your personal information for a particular purpose (where we have asked for your consent to use your information for that particular purpose);
- Receive or transmit your data in a machine-readable and structured format (otherwise known as “data portability”) – request the receipt or transmission of your personal information to another organisation, in a structured and machine-readable format;
- Object to the use of your data – at any time, object to us processing your personal information where it is based exclusively on our legitimate interests or for direct marketing purposes;
- Object to any automated decision-making, if applicable – request us not to subject you to a decision based solely on automated decision making, including profiling, where the decision would have a legal effect on you or produce a similarly significant effect.

Subject to any overriding legal obligations, requirements and/or exemptions, we will endeavour to respond to your request within thirty (30) days of receipt, unless we require further information from you.

To make a request, you will need to complete an application form verifying your identity and specifying what information you require.

WHAT IF YOU HAVE A COMPLAINT?

If you consider that any action of ours breaches this privacy notice or DIFC data protection or otherwise doesn't respect your privacy, you can make a complaint to us or with the DIFC Data Protection Commissioner. If you choose to send us the complaint, please note that your complaint will be acted upon promptly.

To make a complaint to us, please phone us on +971 (0)4 559 2100, or write to us at: IG Limited, Al Fattan Currency House Tower (2), Level 27, DIFC, Dubai, UAE, PO Box 506968 or email: helpdesk.ae@ig.com.

HOW TO CONTACT US

If you want to:

- make a general enquiry about our privacy notice; or
- exercise any of your rights under this privacy notice

phone us on 04 559 2100

IG
Level 27
Al Fattan Currency House, Tower (2), DIFC
Dubai
UAE

ACCESS POLICY

(1) This policy will govern all dealings between us 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. 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.

(3) 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.

(4) We and our licensors (as the case may be) will retain the intellectual property rights in all elements of the software and such software and databases contained within our Electronic Trading Services and you will not in any circumstances obtain title or interest in such elements.

(5) 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 any Electronic Trading Services, you agree that: (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) 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; (d) you will use such data or information solely in compliance with the applicable regulations and this policy; and (e) we may at our absolute discretion remove your access to market data at any time.

(6) No one other than a party to this policy, their successors and permitted assignees shall have any right to enforce any of its terms.

(7) This policy and all our dealings with you are in all respects governed by the laws of the DIFC, and the Courts of the DIFC 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.