

## **PRIVACY POLICY, dated April 1<sup>st</sup>, 2017**

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Please read this privacy policy carefully. It is the stated policy of XTB that XTB will act in accordance with current best practice with regard to the processing of personal data. XTB understands the importance of maintaining the privacy of your personal information. By entrusting XTB with your information, company would like to assure you of our commitment to keeping it private.

If you decide to apply to open an account with XTB, there is certain information that we will require from you in order to do so. This information includes, but is not limited to personal details such as name, address, date of birth, contact details, employment details, assets and liabilities, payment details, including credit card, debit card and bank account details, and other necessary financial information. From time to time XTB may also request further information to improve its service to you. XTB obtains most of the information directly from you through application or other forms, and from maintaining records of information provided in the course of ongoing customer service. XTB may also collect information about your use of the website, such as pages visited, frequency and duration and visit and trading activities.

XTB will use information collected from you to provide the information and services requested by you and to improve the quality of XTB service. Unless you are informed otherwise, the personal information XTB holds is used for establishing and managing your account, reviewing your ongoing needs, enhancing customer service and products, giving you ongoing information or opportunities that may be relevant to you according to XTB Team belief.

XTB limits access of your data to only those affiliates, employees, and related companies that need to know the information in order to assist in carrying out your request for products or services. XTB has procedures in place regarding how to safeguard and use non-public personal information.

Depending on the product or service concerned and particular restrictions on sensitive information, this means that personal information may be disclosed to: service providers and specialist advisers to us who have been contracted to provide XTB with administrative, financial, research or other services; referring parties and introducing partners with whom XTB has a mutual relationship; courts, tribunals and regulatory authorities as agreed or authorized by the law, and when it is believed that disclosure is necessary to protect XTB rights and/or comply with a judicial proceeding; or reference agencies; anyone authorized by an individual, as specified by that individual or the contract.

While we will use all reasonable efforts to safeguard your personal data, you acknowledge 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 transferred from you, or to you via the internet.

You may inform us at any time that your personal details have changed or that you wish us to delete personal information we hold about you by emailing us at [cs\\_int@xtb.com](mailto:cs_int@xtb.com). We will change or delete your personal information in accordance with your instructions, except to the extent that we are required to hold your personal information for regulatory or legal purposes, to provide you with the services you have requested or to maintain adequate business records.

If you open an account with us, you will need to use our trading software which enables us to use cookies in relation to your access to this website.

Cookies are small files of information, which often include a unique identification number or value, which are stored on your computer's hard drive as a result of you using this trading software and accessing this website. The purpose of this information is to provide you with a more relevant and effective experience on this website, including presenting web pages according to your needs or preferences. 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 this site 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.

### **Mobile Applications Privacy Policy**

This chapter describes the privacy policy of XTB mobile applications.

The mobile device stores an enciphered unique Application Identifier (the parameter is generated in the process of Application registration on the XTB side) – it is stored on the device until the deletion of the mobile application from the device. The Application Identifier referred to above and information about the brand, type and hardware token of the mobile device is transferred to XTB in the registration process of the device in the Application and it is used for explicit identification of the Application and the mobile device.

The communication between the mobile application and XTB system is held with the use of advanced deciphering mechanisms.

Depending on a mobile platform, XTB applications may gain access to the following functions on the mobile device:

- a. Internet connection;
- b. Device camera to take pictures of documents and/or user's face during real account registration;
- c. Photo gallery on the device to send pictures of documents and/or user's face during real account registration;
- d. Access to user's space to save a picture;
- e. Advertising Identifier (IDFA) to monitor efficiency of our own advertising campaigns and installation of our application;
- f. Chat microphone;
- g. Phone mode in order to switch on the sleep mode of the application when it is in the background.

Depending on the mobile application, application functions may be cancelled by changing system settings on the device or uninstalling the application.

Mobile applications do not store any personal data which could allow a third party to identify a particular application user. Anonymous data concerning users' activity on Mobile Applications may be processed by XTB for statistical purposes.

Additionally, XTB informs that the applications have two connected services:

1. Google Firebase – to collect statistical data of application performance and information about the way customers use the application, such data is fully anonymous, and
2. Fabric.io – to collect statistical data of application performance and information about the way customers use the application, such data is fully anonymous, additionally, this service allows XTB to collect crash, i.e. applications' errors which are also fully anonymous and deprived of any data which may enable to identify the customer or their information.

If you do not consent to this privacy policy, please do not install the Application, or uninstall it.

From time to time this Privacy Policy may be updated.