PRIVACY POLICY, dated July 17th, 2024

The herebelow policy has been implemented under the legal codes of Belize, particularly the Data Protection Act, of 2021. It is the stated policy of XTB International Limited (XTB) that the Firm shall act in accordance with the law and current best practices concerning the processing of personal data. XTB understands the importance of maintaining the privacy of your personal information.

From time to time this policy shall be updated and such update shall be announced at least 7 days beforehand.

All your data that you provide to us or we gather during your use of our services will be controlled by XTB International Limited, incorporated in Belize under Registered Number 000000587 at 35 Barrack Road, 2nd Floor, Belize City, Belize.

If you have questions or require clarification on anything regarding this policy, you can contact our Customer Service department at cs_int@xtb.com.

If you wish to exercise your rights under the Data Protection Act, 2021, or this policy, particularly your right to receive information, correct, amend, or request deletion of your data as well as amend or withdraw your consents for data processing please contact cs_int@xtb.com.

Should you have an issue or complaint regarding the data processing you can request that your case is reviewed by XTB's Data Protection Officer.

If you decide to apply for an account with XTB, there is a certain scope of information that we will require from you to do so. We may also require, gather, and process data related to you, including data allowing for personal identification of you as well as sensitive and protected categories of data. This information includes:

- full name, address, and contact details including residential, postal, e-mail addresses, phone numbers, and communicator details;
- identification document number;
- date of birth and gender;
- information about your income and wealth including details about your assets and liabilities, account balances, trading statements, tax, and financial statements;
- profession and employment details;
- location data;
- trading performance and any other similar information;
- payment details, including credit card, debit card, and bank account details, and other necessary financial information;
- credit reporting or reference agencies;
- any affiliate or introducing broker with whom we have a mutual relationship or other relationships that may be relevant to our business Anyone authorized by you or otherwise related to you;
- details regarding your use of our platform and services;
- details regarding software and hardware you use to communicate with us and use our services.

XTB obtains most of the information directly from you through applications or other forms, and from maintaining records of information provided or gathered 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 visits and your activity while using them.

XTB will use the information collected from you for the following purposes:

- to provide you with XTB's Services and customer support;
- to process transactions and send notices about your transactions;
- to verify your identity by comparing your personal information against third-party databases and previously gathered information;
- to enhance security, prevent fraud, monitor and verify identity or service access, combat financial crime or other security risks;
- to comply with legal obligations and protect XTB's interests, including cooperating with law enforcement;
- to send administrative or account-related information to you;
- to better understand our customers and end-users and the way they use and interact with XTB products and services;

- to customise, measure, and improve XTB's services and products;
- to provide a personalised experience and implement the preferences you request. website and applications;
- to deliver targeted marketing, service update notices, and promotional offers;
- to interact with you on third party social networks;
- to communicate with you about our events or our partner events;
- to prevent and investigate potentially prohibited or illegal activities, and/or violations of our posted user terms;
- to resolve disputes, collect fees, and troubleshoot problems.

The provision of services is not dependent on your consent for the use of your data for marketing purposes.

We may share your data with counterparties necessary to process your transactions, courts, regulatory and law enforcement bodies as well as third parties whose services XTB relies on to satisfy our regulatory obligations including testing and development of those solutions.

We may share your data with other 3rd parties for the purposes of improving services and marketing.

Your data may be processed and stored in 3rd party servers (Cloud storage and processing).

XTB only processes data using services that offer data protection standards not lower than those under the Data Protection Act, 2021.

XTB limits access to your data to only those affiliates, employees, counterparties, and related companies that need to know the information to assist in carrying out your request for products or services or other functions as noted in this policy. XTB operates with procedures in place regarding cybersecurity and data safeguarding as related to it by our parent company XTB S.A.

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 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 the personal information we hold about you by emailing us at 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 and secure our legal interests.

In case of termination of our agreement with you, your data necessary to satisfy legal requirements as well as important to protecting XTB's legal interests will remain stored for a period of 7 years unless required otherwise.

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. All stipulations hereabove remain relevant for use of XTB mobile applications and the following should be understood as further disclosures.

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

XTB International Limited   www.xtb.com

XTB International Limited is a limited liability company established in Belize under Registration No. 000000587 (former Registration No. 153,939) and authorized by the Financial Services Commission of Belize (FSC) under Registration No. 6442514. Company address: 35 Barrack Road, 2nd Floor, Belize City, Belize, C.A.

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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:

- Internet connection;
- Device camera to take pictures of documents and/or user's face during real account registration;
- Photo gallery on the device to send pictures of documents and/or user's face during real account registration;
- Access to user's space to save a picture;
- Advertising Identifier (IDFA) to monitor efficiency of our own advertising campaigns and installation of our application;
- Chat microphone;
- 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. 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.

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