

# FX Analytics Privacy Policy

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Welcome, and thank you for your interest in FX Analytics Corporation. (“FX Analytics,” “we,” “our,” or “us”) and our website at [www.fxanalytics.com](http://www.fxanalytics.com), and our Services (defined below). This Online Privacy Statement (“Privacy Policy”) applies to websites and other online services that provide features or functionality for account holders and applicants (collectively, “Users” or “You”) of FX Analytics. This Privacy Policy outlines how FX Analytics processes the information we collect about you through our online services and when you otherwise interact with us, such as through our customer service channels.

## 1. INFORMATION WE COLLECT AND HOW WE COLLECT IT.

**1.1. Information You Provide.** We collect information you provide when you use, or apply to use, our Services or otherwise engage or communicate with us, such as:

**1.1.1. Identity Data**, such as your name, date of birth, face data (retained for 6 years after collection for compliance purposes) and government-issued identification documents, and other data on government-issued identification documents;

**1.1.2. Contact Data**, such as your email address, mailing address, and telephone number;

**1.1.3. Financial Data**, such as your bank account and payment card details, and information about your income, account balances, financial transaction history, credit history, tax information, and credit scores;

**1.1.4. Profile Data**, such as your password, preferences, feedback, and survey responses;

**1.1.5. Other Information You Provide:** We collect additional personal information that you choose to provide to us, such as via customer support, or other means. You may also provide us with information about additional authorized users, including Identity Data, Contact Data, and Financial Data relating to them.

**1.2. Information We Collect Automatically or Generate.** As is true of many digital platforms, we also collect certain information about you automatically when you use our Services, such as:

- 1.2.1. Usage Information:** We collect information about your activity on our Services, which includes device identifiers (like IP address or mobile device identifiers), pages or features you use, time and date of access, and other similar usage information.
- 1.2.2. Transactional Information:** When you receive, submit, or complete a transaction via the Services, we collect information about the transaction, such as transaction amount, type and nature of the transaction, and time and date of the transaction, and location of the merchant for credit card transactions.
- 1.2.3. Information Collected Through Tracking Technologies:** We and our service providers also use technologies, including cookies and web beacons, and software development kits (“SDKs”), to automatically collect certain types of usage and device information when you use our Services or interact with our emails. The information collected through these technologies includes your IP address, browser type, internet service provider, platform type, device type, operating system, date and time stamp, a unique device or account ID, usage information and other similar information. For information about how to disable cookies, review Your Controls.
- 1.3. Information We Collect from Other Sources.** We also obtain information about you from other sources as described below.

  - 1.3.1. Vendors and Business Partners:** We collect information about you from companies that we do business with, such as name, contact data, inferences about your preferences and attributes, as well as inferred fraud risk, from identity verification and fraud prevention partners.
  - 1.3.2. Financial Account Linking:** We may receive financial account information about you from third-parties, such as your financial institutions. For example, FX Analytics offers account linking and aggregation services through Plaid, Inc. (“Plaid”). Your use of Plaid is subject to their End User Privacy Policy as well as their End User Services Agreement.
  - 1.3.3. Publicly Available Data:** This may include contact information, your interactions with our social media platforms, and other information from publicly available sources, such as public websites.
  - 1.3.4. Data from other users:** If you are in another user’s contact list and they choose to disclose that list with us, then we will collect the contact information and your association with that user.
  - 1.3.5. Credit Information:** We may receive credit-related information about you from third parties, such as credit bureaus. For example, if you apply for an

account with FX Analytics, we may collect your credit history and credit scores from credit bureaus and other partners.

2. **HOW WE USE YOUR INFORMATION.** We use the information we collect for purposes described below or as otherwise described to you at the point of collection:
  - 2.1. **Maintain and provide the Services**, including processing account applications, authenticate your identity, repair our Services, support, process and record transactional information, and handle billing and account management;
  - 2.2. **Send you transactional or relationship information**, including confirmations, invoices, technical notices, customer support responses, software updates, security alerts, support and administrative messages, and information about your transactions;
  - 2.3. **Communicate with you about offers and other things we think you will be interested in**, such as newsletters, product announcements, partner offerings, surveys, events or announcements, and personalized advertising;
  - 2.4. **Personalize our Services**, such as by suggesting content or customizing content or ads we show you;
  - 2.5. **Monitor and improve our Services**, including analyzing usage, research and development;
  - 2.6. **Help protect the safety and security of our Services**, business, and users, such as to investigate and help prevent fraud or other unlawful activity;
  - 2.7. **Protect or exercise our legal rights or defend against legal claims**, including to enforce and carry out contracts and agreements; and
  - 2.8. **Comply with applicable laws and legal obligations**, such as compliance obligations associated with being a technology services business.
  - 2.9. **Any other lawful purpose for which we obtain your consent.**
3. **DISCLOSURES OF INFORMATION.** We are committed to maintaining your trust, and we want you to understand when and with whom we disclose information about you. We disclose information about you in the instances described below.
  - 3.1. **Authorized vendors:** We disclose information about you with third-party vendors and service providers who perform services for us, such as identification verification, fraud prevention, advertising, mailing services, tax and accounting services, contest fulfillment, web hosting, and analytics services. For example, we use an identification verification service provider, Onfido to help determine whether a selfie you take matches the photo in your government-issued identification. With your consent, we may also record your voice and send this data to our vendor to authenticate you and to help prevent fraud. The information

collected from your photo and your voice by our vendors for these purposes may include biometric data.

- 3.2. Marketing partners:** We disclose information about you to third-party advertising and analytics services, including as described in Third-Party Tracking and Online Advertising. For example, we may share personal data such as your hashed email address or your device ID with marketing partners to help us market FX Analytics products to you across third-party websites and online services.
  - 3.3. FX Analytics affiliates:** Where appropriate, we disclose information about you to other companies owned or controlled by FX Analytics Corporation. For example, if you are a FX Analytics Corporation customer, we may disclose information about you to FX Analytics Capital, LLC to provide you with business factoring and other related services, or to Disruption Trading, LLC, to provide you with other offerings. This information could include your name, address, telephone number, and/or social security number. These companies will process any information disclosed to them in the same manner as described under this Privacy Policy.
  - 3.4. Substantial corporate transactions:** We may disclose information about you in connection with a substantial corporate transaction, a merger, consolidation, reorganization, financing, change in control or acquisition of all or a portion of our business by a third party, or in the unlikely event of a bankruptcy or similar proceeding.
  - 3.5. Legal purposes:** We disclose information about you if we believe that disclosure is in accordance with, or required by, any applicable law or legal process or to protect and defend the rights, interests, safety, and security of FX Analytics, our users, or the public.
  - 3.6. With your consent:** We disclose information about you for any other purposes disclosed to you with your consent.
  - 3.7. Mobile Information Privacy:** No mobile information will be shared with third parties or affiliates for marketing or promotional purposes. Text messaging originator opt-in data and consent are excluded from all other categories of information sharing and will not be disclosed to any third parties.
- 4. THIRD-PARTY TRACKING.** We use third-party advertising and analytics services to better understand your online activity and serve you targeted advertisements. For example, we use FullStory and you can review the “How FullStory uses information from sites or apps that use our services” linked here: <https://www.fullstory.com/legal/privacy-policy/> for information about how FullStory processes the information it collects. These companies collect information about your use of our Services and other websites and online services over time through cookies, device identifiers, or other tracking technologies. The information collected includes your IP address, web browser, mobile network information, pages viewed, time spent, links

clicked, and conversion information. We and our third-party partners use this information to, among other things, analyze and track data, determine the popularity of content, as well as to provide advertising-related services to us such as reporting, attribution, analytics, and market research.

## 5. YOUR CONTROLS.

**5.1. Account profile:** You can update certain account profile information by logging into your account. For example, you may choose to update your login email. For some FX Analytics products and services, some information cannot be changed due to legal requirements, and in those cases we may not be able to accommodate your request. Please note that any changes you make to your account profile must be in accordance with our FX Analytics Product Agreement.

**5.2. How to control your communications preferences:** You can stop receiving promotional emails from us by selecting the “unsubscribe” link in those emails. We may still send you service-related or other non-promotional communications, such as account notifications, receipts, security notices and other transactional or relationship messages.

**5.3. Data sharing permissions:** Account holders have certain choices about the sharing of their personal information with marketing partners for FX Analytics marketing purposes. If You disable these permissions, we will no longer share personal information with marketing partners to more effectively market our services across third-party websites and services. Check out Managing your data sharing preferences for more details.

**5.4. Cookie controls:** Many web browsers are set to accept cookies and similar tracking technologies by default. If you prefer, you can set your browser to delete or reject these technologies. If you choose to delete or reject these technologies, this could affect certain features of our Services. If you use a different device, change browsers, or delete the opt-out cookies that contain your preferences, you may need to perform the opt-out task again.

**5.5. Additional US State Privacy Rights:** Residents of some states may have rights with respect to their personal information, such as rights to access, delete, or correct such information and to opt out of certain processing activities.

**6. CHILDREN.** We do not knowingly collect or solicit any information from anyone under the age of 13 through our Services. If we become aware that a child under 13 has provided us with personal information for any reason, we will take reasonable steps to delete that information. If you reasonably believe that we might have information from a child under 13 who is not an authorized user, please contact us at [compliance@fxanalytics.com](mailto:compliance@fxanalytics.com).

**7. CHANGES TO THIS PRIVACY POLICY.** This Privacy Policy will evolve with time, and when we update it, we will revise the "Last updated date" above and post the new policy

and, in some cases, we provide additional notice (such as adding a statement to our website or sending you a notification). To stay informed of our privacy practices, we recommend you review the statement on a regular basis as you continue to use our Services.

- 8. HOW TO CONTACT US.** If you have questions about this Privacy Policy, contact us at [compliance@fxanalytics.com](mailto:compliance@fxanalytics.com).