

## Privacy Policy

*This Privacy Policy has been prepared by the company operating under the name OANDA Global Corporation (hereinafter: “**Data controller**” or “**OGC**” or “we”).*

*Based on Art. 13 (1 and 2) and Art. 14 (1 and 2) of Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (General Data Protection Regulation; hereinafter: the “**GDPR**”) below we present you with information on the rules of processing and protection of your personal data.*

### **1. Who is responsible for your personal data?**

The Data controller of personal data is OANDA Global Corporation with its seat in New York, address: 228 Park Ave S, Suite 20236, 10003-1502, New York, USA, a company entered in the register of entrepreneurs under the number 5809896.

### **2. How to contact the Data controller?**

In matters relating to the processing of personal data by the Data controller, you can contact us using the following e-mail address: [pr@oanda.com](mailto:pr@oanda.com).

You can also make an appointment at our office or send information via post.

### **3. On what legal basis and for what purpose are your personal data processed?**

Your personal data will be processed in order to send you e-mails containing an analysis of market events as well as a press release in this regard.

The legal basis for the processing of your personal data is the legitimate interest of the Data controller (Art. 6 (1f) of the GDPR), consisting in the possibility of immediate transfer of information in the above scope to persons potentially interested in it due to the position taken.

The data controller carried out a balancing test dedicated to the discussed process of personal data processing. If you contact OGC and provide additional personal data, it will be processed based on your consent (Art.6 (1a) of the GDPR). To the extent that the personal data is processed on the basis of a separate consent, you have the right to withdraw your consent at any time. However, this will not affect the lawfulness of personal data processing that was carried out before its withdrawal.

Personal data processing for purposes other than the above may take place: (i) on the basis of obtaining additional consent, (ii) under applicable law, or (iii) when it is consistent with the purpose for which the personal data was originally collected (Art. 6 (4) of the GDPR).

If the documents provided by you contain personal data referred to in Art. 9 sec. 1 of the GDPR (special categories of personal data), they will be processed with your consent (Art. 9 (2a) a of the GDPR), which may be revoked at any time.

#### **4. What are your rights in the scope covered by the Privacy Policy?**

You have certain rights in relation to your personal data, but please be aware that certain exceptions apply to the exercise of these rights and so you will not be able to exercise these in all situations. The Data controller exercises your rights without undue delay, generally, within one month of receiving the request.

- 1) Subject access: You have a right to be provided with access to your personal data processed by the Data controller.
- 2) Rectification: You have the right to request the Data controller to correct your personal data that is incorrect, as well as to request supplementing incomplete personal data.
- 3) Erasure: You have the right to request the Data controller to erase your personal data in any of the following cases: (i) when personal data are no longer necessary for the purposes for which they were collected or otherwise processed, (ii) when personal data is processed unlawfully, iii. when personal data must be removed in order to fulfil the legal obligation provided for in generally applicable regulations. However, the Data controller will not be able to erase personal data to the extent that their processing will be necessary for: (i) exercising the right to freedom of expression and information, (ii) compliance with a legal obligation that requires processing on the basis of universally applicable regulations, (iii) statistical purposes on the terms set out in the GDPR, (iv) establishing, investigating or defending claims.
- 4) Restriction: You have the right to request the Data controller to limit the processing of personal data in cases where: (i) you question the correctness of personal data - for a period allowing the Data controller to check the correctness of this data, (ii) the processing is unlawful, and you oppose the deletion of personal data and request the restriction of their use instead, (iii) the Data controller no longer needs personal data for the purposes of processing, but you need them to establish, assert or defend claims.
- 5) Portability: To the extent that personal data is processed in order to conclude and perform a contract or processed on the basis of consent, and data processing is carried out in an automated manner - you have the right to receive your personal data from the Data controller in a structured, commonly used and machine-readable format. You also have the right to send this personal data to another entity or request it from OGC.
- 6) Object: You have the right to object to the processing of your personal data if the Data controller processes this data in a legitimate interest. We may disregard the objection if we demonstrate the existence of valid, legitimate grounds for processing, overriding your interests, rights and freedoms, or grounds for establishing, pursuing, or defending claims.
- 7) You also have the following additional rights:
  - a) Withdrawal of consent: In the circumstances where you may have provided your consent to the processing of your personal data, you have the right to withdraw any consents to processing that you have given us and prevent further processing if there is no other ground under which we can process your personal data.

- b) Raise a complaint: You can raise a complaint about our processing with the data protection regulator in your jurisdiction.

## **5. Providing personal data**

If the Data controller processes personal data provided directly by you - their providing is voluntary.

## **6. Automated decision making**

You will not be subject to a decision which is based solely on automated processing, including profiling, and produces legal effects for you or similarly significantly affects it.

## **7. Who is your personal data shared with?**

The Data controller may transfer your data to the following categories of recipients: a company from the capital group to which the OGC belongs, legal advisers, associates, entities providing servers and data storage, software suppliers for the database management and shipping of information (such as Prezly BV).

## **8. Transfer of personal data to third countries**

Data controller transfers your personal data to recipients outside the EEA, i.e. to third countries. In the case of transfer of personal data to third countries, i.e. to recipients based outside the European Economic Area, the OGC transfers them using mechanisms consistent with applicable law, which include, inter alia, the use of standard data protection clauses adopted by the Commission or adequacy decisions. You can get more information in this regard each time by contacting the Data controller in accordance with point 2 of the Privacy Policy.

## **9. How long is your personal data kept?**

Personal data processed by Data Controller on the basis of a legitimate interest will be processed until you exercise your right to erasure, which you can implement directly via the appropriate button within the e-mail sent or by contacting the Data controller in accordance with point 2 of the Privacy Policy.

## **10. Source the personal data originate**

The Sata controller processes personal data provided directly by you or that come from publicly accessible sources. You can get more information in this regard each time by contacting the Data controller in accordance with point 2 of the Privacy Policy.