EU PRIVACY POLICY

When using our services, as a resident of one of the EU member states, we shall process personal data of our customers ("you", "your" or the "Customer") as following. This Privacy Policy (the "Policy") provides you with information about how your data are processed.

In this Privacy Policy, you will find information regarding the following:

1. Who is the controller of your personal data and whom to contact?
2. What information do we collect about you and how do we obtain it?
3. How do we use your personal data?
4. How do we store personal data and how are they secured?
5. To whom do we make your personal data available?
6. Do we transfer your data to third countries and international organizations?
7. What are your rights and how can you exercise them?

1. WHO IS THE CONTROLLER OF YOUR PERSONAL DATA AND WHOM TO CONTACT?

The controller of personal data is FXIFY FUTURES LIMITED, with its registered office at SUITE 302, 2 PEMBROKE STREET UPPER, DUBLIN, Dublin 2, Ireland, company no.: 769468 (hereinafter referred to as "we", "our", "our Company", or "Controller").

You can contact FXIFY FUTURES LIMITED at office at SUITE 302, 2 PEMBROKE STREET UPPER, DUBLIN, Dublin 2, Ireland, or at support@futureify.com regarding any questions and the exercise of rights relating to the processing of your personal data.

2. WHAT INFORMATION DO WE COLLECT ABOUT YOU AND HOW DO WE OBTAIN IT?

In this section, you can read general information about which of your personal data we collect and how we collect it. Detailed information on the purposes for which we process personal data is given in Section 3 of this Policy. All information on the basis of which we can directly or indirectly identify you or which is related to you is considered personal data.

We obtain most of the data we collect about you directly from you in connection with your use of our services. This includes, in particular:

1. Data that you provide to us yourself, especially when you register on the website, enter information into your user account, order services,

participate in our events and projects, or when you communicate with us through customer support or social networks. These are identification and contact data, specifically the name, surname, telephone number, e-mail address, postal address, date of birth, user name and password, and business identification number or tax registration number, if you are an entrepreneur; payment data, such as bank details; and other data, such as records of communication between you and our company or details of any warranty claims.

2. Data that we automatically collect when you use our services. These are data about your device (such as the IP address, device type, operating system, browser used, connection provider); website usage data (such as the date, time and duration of visit, a country from which you visit the website, website browsing history), and data on the use of services (such as the login and logout information, your account settings, the value of your fictitious capital, your account currency, business strategy).

Some data about you is provided to us by third parties, such as providers of trading platforms that you choose for use of our services, and social network operators if you decide to link your social networking accounts to an account on the website. This includes:

3. Data about the simulated transactions you have completed (such as the type of financial instrument, time of opening and closing the position, amount of investment, profit and loss) and data from social networks (username, profile picture, e-mail address associated with the account on the social network). For information on how your personal data are processed by trading platform providers and social network operators for their own purposes, please refer to the privacy policies of those parties.

3. HOW DO WE USE YOUR PERSONAL DATA?

We use personal data for the following purposes:

- Registration and user account

In order to use the services, you must register on the website and create your account, and for this purpose we process your personal data.

Personal data: identification and contact data; we may also process your data related to the settings of your user account.

Legal ground for the processing: Processing is necessary for the performance of the contract, and the provision of these personal data is required, as we cannot register your user account without them.

- Provision of services and exercise of rights and obligations under the contract between us and the customer

In order to be able to provide you with our services, i.e. in particular to provide you with the relevant access, tools and support, and to carry out trades, we need to process your personal data. For this purpose, the following shall apply:

Personal data: Identification and contact data and, in the case of paid services, also payment data, data on the use of the services, data on the simulated trades and, if you decide to link your social networks accounts with the account on the website, also data from social networks.

Legal ground for the processing: Processing is necessary for the performance of the contract on the basis of which we provide our services, or on the basis of our legitimate interest. After we stop providing you with services, we process personal information for a limited period of time. Such processing is necessary for the purposes of exercising and protecting our rights based on our legitimate interests.

- Marketing communication about our services and products or about events in which we take part

If you are our current or past customer, we may from time to time send you marketing communications that relate to our services. We may also send you commercial communications to the extent to which you give us your consent. Each of the e-mails sent will be marked as a business communication and each of them will contain a link with the help of which you can easily unsubscribe from the business communications. For this purpose, the following shall apply:

Personal data: Identification and contact data.

Legal ground for the processing: If we have provided you with our services, we may from time to time send you marketing communications based on our legitimate interest, namely keeping in touch with our customers. If you give us your consent to process your data for marketing purposes, then we process your data on the basis thereof.

- Customer support and communication

If you use our customer support services, we will process your personal data. For this purpose, the following shall apply:

Personal data: Identification data, contact data, other data and data from social networks, if you contact us through social networks.

Legal ground for the processing: Processing is based on our legitimate interest, namely in maintaining customer satisfaction and supporting the use of our services.

- Improving services

If you use some of our services, we will process your personal data in order to develop, test and enhance the services and improve their security. For this purpose, the following shall apply:

Personal data: Identification and contact data, data about your device, website usage data, data on the use of the services, and data on the simulated trades.

Legal ground for the processing: Processing is based on our legitimate interest, namely in improving our services.

- Analytics

To obtain information about how our website and our services are used, we analyse customer behavior. For this purpose, the following shall apply:

Personal data: Identification data, contact data, payment data, data about your device, website usage data, data on the use of the services, and data on the simulated trades.

Legal ground for the processing: Processing is based on our legitimate interest, namely in ascertaining customer behavior and estimating customer preferences.

4. HOW DO WE STORE PERSONAL DATA AND HOW ARE THEY SECURED?

We process your personal data in an encrypted database on computers and other devices. In order to ensure protection against unauthorized access or unauthorized alteration, disclosure or destruction of the data that we collect and process, we have adopted organizational and technical measures to secure them, which we strictly adhere to.

5. HOW LONG DO WE PROCESS YOUR DATA?

Personal data are processed to the extent necessary to fulfil the purposes described above and for the time necessary to achieve those purposes or for a period directly stipulated by law. Thereafter, the personal data are deleted or anonymized. We process personal data for the following periods of time:

1. for the purpose of performance of the contract and for the exercise of rights and obligations in connection with the contract, including any complaints, settlement of damage claims or related litigation, personal data are processed for the necessary period of time, but not more than 10 years from the termination of the last contract;

2. for the purpose of sending business communications without your given consent, personal data are processed for a maximum of 5 years from the expiry of the last contract between us or until you raise an objection or unsubscribe from the business communications;
3. for the purpose of enhancing our services, we usually process personal data for a maximum period of 6 months;
4. in order to fulfil our legal obligations, we process personal data for the period set out by the relevant legal regulations (e.g. in accordance with tax regulations for a period of 10 years from the issuance of the relevant documents for your order);
5. if you have given your consent, for the period specified in the consent.

6. DATA SHARING AND TRANSFERS TO THIRD COUNTRIES

We make your data available or transfer them to persons that help us provide our services, in particular the following persons:

1. The trading platform provider, in order to enable you to perform the simulated trades.
2. Other third parties that help us run our website and provide our services (such as other companies in our group, hosting and cloud service providers, payment system operators and financial institutions, providers of customer support tools and services, IT companies and system administrators, marketing and communication agencies, consultants and postal service providers);

In addition, we may transfer your data to persons in respect of which you give your consent thereto, as well as in the cases where it is our obligation under the law or under a judicial or any other legally binding decision. Each such entity to whom personal data are transferred is contractually obligated to protect your personal data in accordance with legal provisions and to process the data exclusively according to our instructions.

Certain third parties collect personal data for their own purposes as controllers. In such a case, their own rules for the processing of personal data shall apply.

7. YOUR RIGHTS

You can exercise all your rights mentioned below, including your right to erasure of personal data and the withdrawal of your consent, by sending a request to us via email at support@futureify.com, alternatively you can use our contact details in Section 1 of this Privacy Policy. There are no specific words that you must use in your request, but please be specific enough, so we can help you with your request (e.g. identify yourself, specify the right you wish to exercise, what action you wish us to take, details of what personal data you want erased/deleted, etc.)

In connection with the processing of personal data you have the following rights:

- Right of access to personal data

You can ask us at any time to send you a confirmation as to whether or not your personal data are being processed. If we process your data, we will provide you with further details on the processing. If you request it, we will also provide you with a copy of the personal data processed. Please note that the first copy is free of charge, but later copies will be provided for a small fee.

- Right to rectification of personal data

If we process your personal data inaccurately, you can notify us of this fact, and we will rectify the inaccurate personal data without undue delay. If you register on the Website, you will be able to rectify and amend your personal data yourself by editing your user account.

- Right to erasure of personal data ("right to be forgotten")

You have the right to obtain from us the erasure of personal data concerning you without undue delay in the following cases:

- If the data are no longer necessary in relation to the purposes for which we have collected or otherwise processed them;
- If you withdraw your consent to their processing and, at the same time, there will be no other legal ground for their processing (this only applies in the cases where we process personal data on the basis of your consent);
- If you object and there are no overriding legitimate grounds for the processing, or if you object to the processing for direct marketing purposes; or
- If your personal data are processed unlawfully.

We will not be able to act on the request for the erasure of personal data if their processing is necessary for exercising the right of freedom of expression and information, for compliance with any of our legal obligations, for the performance of a task carried out in the public interest, for the establishment, exercise, or defense of our legal claims, or for other reasons provided for by law.

- Right to restriction of processing

In cases stated in article 18 of the GDPR, you have the right to obtain from us restriction of processing of your personal data for a certain period.

- Right to data portability and to the provision of data in a machine-readable format

In the case of automated processing based on your consent or performance of the contract, you have the right to receive the data in a structured, commonly used and machine-readable format and to have them transmitted by us to another personal data controller.

- Right to object

If we process personal data on the basis of our legitimate interest, you have the right to object to such processing. If you file such an objection, we will not be able to process your personal data unless we demonstrate compelling legitimate grounds for the processing which override your interests or rights and freedoms, or for the establishment, exercise or defense of our legal claims.

In case we process your personal data for marketing purposes about our products and services, we will terminate the processing without undue delay upon receipt of the objection. In such a case, we will no longer be able to send you offers of our products and services.

- Right to withdraw consent

If processing is based on your consent, you have the right to withdraw that consent at any time. Withdrawal of consent does not affect the lawfulness of processing based on the consent given before its withdrawal.

- Right not to be the subject of automated decision-making

Except where processing is necessary for entering into, or performance of, a contract, where this is permitted by applicable law, or based on your express consent, you have the right not to be the subject of any decision which is based solely on automated processing, including profiling, which produces legal effects concerning you or similarly affects you to a significant extent.

- Right to lodge a complaint with the supervisory authority

If you believe that we are processing your data in violation of the relevant legal regulations, you can lodge a complaint with the relevant supervisory authority. Based on our registered office, our relevant supervisory authority is Information Commissioner's Office, is at Data Protection Commission 21 Fitzwilliam Square South Dublin 2 D02 RD28 Ireland

More information about the Office can be found on the following website: https://www.dataprotection.ie/en

8. COOKIES AND SIMILAR TECHNOLOGIES

We use cookies and similar tracking technologies to enhance your experience on our website and provide our services. A cookie is a small text file that is placed on your device when you visit our website.

Types of Cookies We Use:

Essential Cookies:

- Required for basic website functionality
- Enable secure login and navigation
- Cannot be disabled as they are necessary for the website to work properly

Functional Cookies:

- Remember your preferences and settings
- Improve website usability
- Can be disabled but may limit some website features

Analytics Cookies:

- Help us understand how visitors use our website
- Collect anonymous statistical data
- Used to improve our services and user experience

Marketing Cookies:

- Track your browsing habits
- Enable us to deliver targeted advertising
- Always require your explicit consent

Your Cookie Choices:

- You can manage cookie preferences through your browser settings
- You may withdraw consent for non-essential cookies at any time
- Blocking certain cookies may impact website functionality

Third-Party Cookies:

We allow selected third parties to place cookies through our website to provide analytics and marketing services. These companies may use your data according to their own privacy policies.

Cookie Settings:

You can review and modify your cookie preferences at any time through our Cookie Settings panel accessible via the website footer.

For detailed information about the specific cookies we use and their purposes, please contact us at support@futureify.com.

9. FINAL PROVISIONS

We may change this policy unilaterally, but we will do so only when necessary and we will notify you about such change. You can find the latest version of this policy in your Client Section.