

## Privacy and Policy

Fortuna Markets is committed to protecting the privacy of all personal information that we obtain from you. Our Privacy Policy explains how and why we collect personal information about you, and how that information is maintained and used (“Privacy Policy”). This Privacy Policy applies to all organizations within the Fortuna Markets of companies (except those registered in Canada, China and Singapore) and covers the following:

- What information are we collecting and how are we collecting it?
- Why we collect your information
- How we use your information
- Who may we disclose your information to?
- What rights do you have?
- How we protect your information
- How you can protect your information
- How we protect your information in data transfers
- How long we hold your information
- Cookies and our cookie policy
- What to do if you have a complaint
- Changes to our Privacy and Security Policy
- How to contact us

### What information are we collecting and how are we collecting it?

We will collect and process the following personal information about you:

- **Information you provide to us**  
You provide us with personal information by filling in the application or other forms on our website, the iOS or Android application (Apps), by accessing and trading on your account through our platform or by corresponding with us by phone, email or otherwise. The information you provide us may include your name, email address, physical address, home and mobile phone numbers, contact details, financial information about your income and wealth, identification information such as National Insurance or National Identification number, date of birth, IP address, device ID, MAC address, professional and employment details, records of products and services you’ve obtained or applied for, trading history and other analogous personal information.
- **Information we collect about you**  
We will also collect information about you through your use of this website, the iOS or Android application (Apps) and our platform. This information may include site areas visited, pages viewed, frequency and duration of visits.
- **Information we receive from other sources**  
We may also collect your personal information from third parties, including, for example, business partners, analytics providers, search information providers, credit reference agencies and third-party marketing companies or through publicly available sources.
- **Monitoring of communications**  
Subject to applicable laws, we will monitor and record your calls, emails, text messages, app and digital communications, social media messages and other communications in relation to your dealings with us. We will do this for regulatory compliance, crime prevention and detection purposes, to protect the security of our communications systems and procedures, for quality control and staff training, and so we can provide you with a record of what’s been said when you

require one. We will also monitor activities on your account where necessary for these reasons and this is justified by our legitimate interests or our legal obligations.

### Why we collect your information

Fortuna Markets collects your personal information in order to provide you with our products and services, to establish and manage your account and to comply with the law. By collecting your information, Fortuna Markets is able to monitor and improve the services we offer to our existing and potential clients.

### How we use your information

Fortuna Markets may use your personal information for one or more of the following purposes:

- To provide the services to you that you have requested including processing transactions and customer support;
- To verify your identity when you contact us;
- To conduct security operations such as using your IP address to verify your identity when you log on to your account;
- To carry out fraud prevention checks;
- To maintain your personal profile and manage your account;
- To contact you when necessary or appropriate in relation to the services being provided to you;
- To keep you updated while you are a client in relation to matters such as you're trading or investment activities;
- To manage and administer the products and services provided to you;
- To provide you with information regarding the products and services offered by Fortuna Markets;
- to develop an understanding of the products and services that you may be interested in obtaining from Fortuna Markets;
- To provide you with information or opportunities that we believe may be relevant to you;
- To tailor the website, the iOS and Android application (Apps), or other services we provide to you to meet your needs and interests;
- To create anonymized statistical data – we may share anonymized data with other companies; however, this data will not include any information that personally identifies you; and
- We may also use your personal information, including market research, analysis and developing statistics across Fortuna Markets, to develop an understanding of the products and services that you may be interested in obtaining from Fortuna Markets, and to market such products and services to you.

When we collect and use your personal information, we will make sure this is only done in accordance with at least one of the legal grounds available to us under Data Protection law.

If Fortuna Markets or a fraud prevention agency determine that you pose a risk of fraud or money laundering, or other financial crime, we may refuse or stop providing our services to you.

### Using your personal data: the legal basis and purposes

Fortuna Markets Ltd under registration number: 2023-00154, Address: 1st Floor, The Sotheby Building, Rodney Village, Rodney Bay, Gros-Islet, Saint Lucia  
<https://fortunamarkets.org>, Email: [info@fortunamarkets.org](mailto:info@fortunamarkets.org)

We will process your personal data to provide services to you pursuant to the agreement between us in relation to the relevant account(s). This includes:

- Taking steps at your request prior to entering into the agreement;
- Deciding whether we should enter into an agreement with you;
- Managing and performing our obligations under the agreement;
- Updating your records;
- Tracing your whereabouts or contacting you about your account and recovering any debt; and
- Verifying your identity including when you log on to your account online or when contacting us.

As necessary for our (or our authorized third parties') legitimate interests, for example:

- For good governance, accounting, and managing and auditing your business operations;
- To carry out credit reference agency searches;
- To monitor emails, calls, other communications, and activities on your account, subject to applicable laws;
- For market research, analysis and developing statistics;
- To carry out marketing and send communications, including by email, post, text, digital communications, through our application (Apps), newsletter, banner advertising and other forms of communication including social media campaigns. We may analyze your personal information, as well as your trading activity, so that we can offer a more relevant, tailored service and product offering to you;
- To develop new services and improve the products and services we provide;
- To request your feedback on a product or service via a third party we have chosen;
- You have the right to ask us not to process your personal information for marketing purposes. You can do this by changing your marketing preferences and privacy settings when you log in to your account; using the unsubscribe link provided in relevant emails we send you, or you can also opt out of receiving marketing communications by contacting the customer service team.

As necessary to comply with a legal obligation, for example:

- When you exercise your rights under data protection law and make requests;
- For compliance with legal and regulatory requirements and related disclosures;
- For activities relating to the prevention, detection and investigation of crime;
- For establishment and defense of legal rights;
- To verify your identity, fraud prevention and anti-money laundering checks; and
- To monitor emails, calls, other communications, and activities on your account.

Based on your consent, for example:

- When you request us to disclose your personal data to other people or organizations such as a company handling a claim on your behalf, or otherwise agree to disclosures;
- To comply with our legal obligations and to allow us to identify you for authenticating, reporting, compliance and customer service purposes;
- To carry out marketing in instances when we have asked for your consent and you have provided it; and
- To provide our community forum to you if applicable.

You are free at any time to change your mind and withdraw your consent by notifying us.

### Who may we disclose your information to?

Fortuna Markets may share your personal information with:

- Entities in the Fortuna Markets to develop an understanding of the products and services that you may be interested in obtaining from Fortuna Markets and for other legitimate business purposes;
- Any court or tribunal;
- Financial institutions and other similar organizations that we deal with in the course of our corporate activities or those that are nominated by you;
- Fraud prevention and law enforcement agencies if false or inaccurate information is provided and fraud is identified;
- Anyone else where we have your consent or where we have another lawful basis for doing so;
- An introducing broker if you were introduced to Fortuna Markets by an introducing broker;
- External service providers and professional advisers (which may be located overseas) that provide services to Fortuna Markets, including credit reference agencies;
- Any organization at your request or any persons acting on your behalf, including your financial adviser, broker, solicitor or accountant;
- Any third-party service providers where this is necessary to process a transaction or provide services which you have requested (e.g., software providers);
- Any authority to whom Fortuna Markets is required to disclose such information by law;
- Other financial institutions for the prevention and detection of financial crime, including fraud, money laundering, and terrorism financing; or
- Other parties connected with your account (e.g., other people named on the application).

Please note that Fortuna Markets does not sell or provide your personal information to third parties for marketing purposes.

Fortuna Markets also requires that external organizations, outside of Fortuna Markets, who handle or obtain personal information acknowledge the confidentiality of this information and undertake to respect any individual's right to privacy and comply with all of the relevant data protection laws and this Privacy and Security Policy.

### What rights do you have?

Your rights are as follows in respect of the personal information we hold about you:

- The right to be informed about processing of your personal data;
- The right to have your personal data corrected if it's inaccurate and to have incomplete personal data completed;
- The right to object to processing of your personal data;
- The right to restrict processing of your personal data;
- The right to have your personal data erased (the "right to be forgotten");
- The right to request access to a copy of your personal data and information about how we process it. Please make all requests for access in writing (see how to contact us for details) and provide us with evidence of your identity;
- The right to move, copy or transfer your personal data ("data portability"); and
- Rights in relation to automated decision-making including profiling.

Please note, some of these rights only apply in certain circumstances and we may not be able to fulfil every request.

You can contact us by sending an email to [legal@fortunamarkets.com](mailto:legal@fortunamarkets.com). If you prefer to contact us via phone or by post, please refer to the below section "How to contact us".

We will stop processing your personal data unless the processing is for the establishment, exercise or defense of legal claims or we have a legitimate business purpose or legal grounds for the processing.

### **How we protect your information**

Fortuna Markets is committed to protecting the privacy of all personal information that Fortuna Markets obtains from you.

We continue to adopt industry and information security best practices to protect your personal information and ensure that unauthorized persons do not access it. Measures include encryption of data during transmission, strong authentication mechanisms, cybersecurity processes and secure access to machines and data.

We train our employees who handle personal information to respect the confidentiality of customer data and the privacy of individuals.

### **How we protect your information in data transfers**

We may transfer personal information to other countries outside of the European Economic Area, such as the US. In such circumstances, we will ensure the transfer is lawful and that there are appropriate contractual, legal and security arrangements in place.

### **How you can protect your information**

Just as at Fortuna Markets, you should care about the security of your personal data. Do not give your security details to log in to your account, such as passwords or passcodes, to anyone else. If you feel someone may have gained knowledge of your login details, please contact us so we can support you and protect you and your information.

Additionally, we recommend securing your devices with a password or passcode. If you use our mobile app, we recommend that you enable the use of Touch ID or Face ID.

### **How long we hold your information**

We will remove any personal information that will identify you or we will securely destroy the records when we consider that that personal information is no longer required. This could be a period of seven years after our business relationship with you has ended.

However, we may need to maintain certain records for a longer period, for example, where 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.

### **Cookies and our cookie policy**

Fortuna Markets uses cookies to gather information about your access to this website, the Fortuna Markets application (Apps) and other services we provide to you. Cookies are small pieces of information, which use a unique identification tag and are stored on your device because of you using this website or other service we provide to you.

They enhance your browsing experience in various ways, which include remembering your preference settings, displaying relevant content and ensuring web pages function as intended. For detailed information on the cookies we use and the purposes for which we use them.

When you use this website or other services we provide to you, you may be able to link to other websites. This Privacy Policy does not apply to those sites. Fortuna Markets encourages you to read the privacy policies on such sites.

### **What to do if you have a complaint**

If you have any questions or complaints about the way Fortuna Markets handles your information, please contact us.

### **Changes to our Privacy Policy**

Fortuna Markets may change this Privacy Policy from time to time. When such a change is made, we will post a revised version online. Changes will be effective from the point at which they are posted. It is your responsibility to review this Privacy Policy periodically so you are aware of any changes. By using our services, you agree to this Privacy Policy.

### **How to contact us**

If you have any questions about this Privacy Policy or want to exercise your rights, please contact us by:

- Phone on +359 (2) 4928418
- Email to our customer service team at [helpdesk@fortunamarkets.com](mailto:helpdesk@fortunamarkets.com)