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PRIVACY POLICY

FXCG Group Limited

Effective date: June 2026

Version 2.0 | Review cycle: at least annually and whenever material changes occur

Company	FXCG Group Limited
Registration No.	A000001395
Registered Address	No. 9 Cassius Webster Building, Grace Complex, PO Box 1330, The Valley, AI-2640, Anguilla
Contact	info@fxcg.com www.fxcg.com

This Policy should be read together with the client agreement, risk disclosures, cookie notices and any jurisdiction-specific privacy notice that applies to your relationship with an FXCG entity.

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How to read this Policy

References to “FXCG”, “we”, “us” or “our” mean the FXCG entity that determines how and why your personal data is processed in the relevant context. Where local law gives you additional or different rights, those rights apply in addition to this Policy.

1. About this Policy

FXCG respects the privacy of clients, prospective clients, website and app users, authorised representatives, beneficial owners, business contacts and other individuals whose personal data we process. This Privacy Policy explains the types of personal data we collect, how we collect and use it, when we share it, how long we retain it, the safeguards we apply, and the rights that may be available to you under applicable law.

This Policy applies to personal data processed in connection with FXCG websites, client portals, mobile or web applications, trading and account services, customer support, marketing activities, events and other interactions with FXCG, unless a separate or jurisdiction-specific privacy notice states otherwise.

In this Policy, “personal data” or “personal information” means information relating to an identified or reasonably identifiable individual. “Sensitive personal data” means categories of information that receive enhanced protection under applicable law, which may include health, biometric, racial or ethnic origin, religious or philosophical belief, political opinion, trade-union membership, sexual orientation, genetic information or criminal-offence information.

2. Who We Are and Who Controls Your Data

FXCG is a brand name used by FXCG Group Limited and entities within the FXCG group. FXCG Group Limited is registered in Anguilla under registration number A000001395, with its registered address at No. 9 Cassius Webster Building, Grace Complex, PO Box 1330, The Valley, AI-2640, Anguilla. The website www.fxcg.com is operated by FXCG Group Limited.

The FXCG entity that acts as the controller or equivalent responsible entity for your personal data depends on how you interact with us, your jurisdiction, the services made available to you and the entity with which you contract. Where another FXCG group entity provides your account or service, that entity

may act as controller for personal data relating to that relationship. Any local privacy notice or contractual document identifying the responsible entity should be read together with this Policy.

For privacy enquiries, requests or complaints relating to FXCG Group Limited or where you are unsure which entity is responsible, contact info@fxcg.com. We may direct your request to the relevant FXCG entity where appropriate.

3. Personal Data We Collect

Depending on the services you use and the nature of our relationship with you, we may collect and process the following categories of personal data:

- Identity data: name, date of birth, nationality, gender where required, signature, photographs and identifiers shown on passports, national identity cards, driver licences or similar documents.
- Contact and profile data: residential or postal address, email address, telephone number, language, country of residence, client or account identifiers and communication preferences.
- KYC and compliance data: source of funds, source of wealth, occupation, employer or business information, tax residence, tax identification information, beneficial ownership and control information, politically exposed person or sanctions-screening results, and documents used to verify identity or address.
- Financial and payment data: bank account details, payment method information, deposit and withdrawal records, payment references and related transaction information. Card information may be processed by authorised payment service providers and may not be stored in full by FXCG.
- Trading and account data: account type, trading history, orders, positions, balances, margin information, instruments traded, transaction timestamps, trading preferences, platform activity and related risk information.
- Technical and device data: IP address, device identifiers, browser type, operating system, login data, time zone, approximate location derived from IP or device settings, cookie identifiers, security logs and information about how you use our websites, applications and systems.
- Communications and service data: emails, chat messages, support tickets, call records or recordings where permitted, complaint information, feedback, survey responses and other communications with us.
- Marketing and referral data: campaign source, affiliate or introducing broker reference, event participation, marketing preferences and responses to promotional communications.
- Business and corporate data: information relating to directors, officers, trustees, partners, authorised signatories, agents, shareholders, beneficial owners and other persons connected with corporate, trust or partnership clients.
- Other information reasonably necessary to provide our services, protect our business, comply with law, manage disputes or respond to regulators, courts or law-enforcement authorities.

3.1 Sensitive personal data

We do not seek to collect sensitive personal data unless it is reasonably necessary and permitted or required by applicable law. Where identity-verification or security tools involve facial images, liveness checks or other biometric-related processing, we will process such information only where lawful and with any consent or safeguards required by applicable law.

3.2 Aggregated and de-identified data

We may create aggregated or de-identified information for analytics, service development, security, reporting and business planning. Where information has been effectively de-identified so that it no longer identifies an individual, it may not be treated as personal data under applicable law. We will not attempt to re-identify such data except where permitted for security, testing or legal compliance.

4. How We Collect Personal Data

We collect personal data from a range of sources, including:

- directly from you when you open or manage an account, complete forms, upload documents, fund or withdraw from an account, trade, contact us, attend an event, subscribe to communications or otherwise interact with FXCG;
- from authorised representatives, company officers, beneficial owners, family members or other persons who provide information on your behalf or in connection with an account, where permitted;
- from introducing brokers, affiliates, agents, referrers or business partners where you have engaged with them and the transfer of information is permitted;
- from identity-verification, screening, fraud-prevention, payment, banking, financial-crime or similar service providers where relevant and lawful;
- from public and official sources, such as company registries, court records, sanctions and politically exposed person databases, government records and other lawfully available sources;
- automatically through websites, client portals, apps, trading platforms and security systems, including through cookies, pixels, SDKs, server logs and similar technologies; and
- from FXCG group entities where sharing is necessary to provide services, manage risk, comply with law or administer our relationship with you.

If we receive personal data that we did not request and do not reasonably need, we may delete or de-identify it, unless we are required or permitted to retain it.

5. How and Why We Use Personal Data

We process personal data only for legitimate business, contractual, security, regulatory or legal purposes. Where applicable data-protection law requires a lawful basis, the basis may include performance of a contract, compliance with a legal obligation, our legitimate interests or those of a third party, your consent, or another basis recognised by applicable law.

We may use personal data to:

- open, administer, maintain and close accounts and provide the products and services you request;
- verify identity and eligibility, conduct KYC and customer due diligence, perform sanctions and politically exposed person screening, and comply with anti-money laundering and counter-terrorist financing obligations;
- process deposits, withdrawals, transfers and other payment-related activity;
- execute, record, monitor and support trading and account activity, including margin, leverage, pricing, platform access and risk controls;
- authenticate users, secure accounts, detect suspicious activity, prevent fraud, abuse, cyber threats and unauthorised access, and investigate incidents;
- provide customer service, technical support, account assistance, complaint handling and dispute resolution;
- maintain records, conduct audits, manage operational and financial risk, and meet legal, regulatory, tax, accounting and reporting requirements;
- improve, test, monitor and develop our websites, applications, platforms, products, communications and customer experience;
- conduct analytics, research and business intelligence, including using aggregated or de-identified data;
- communicate service updates, operational notices, legal notices and other information necessary for your account or relationship with us;
- send marketing communications and offers where permitted and subject to your preferences and applicable consent requirements;

- manage relationships with introducing brokers, affiliates and business partners, including attribution, support and commission administration where relevant;
- establish, exercise or defend legal claims, respond to lawful requests and cooperate with regulators, courts, law-enforcement bodies and other competent authorities; and
- evaluate or complete a merger, acquisition, reorganisation, financing, sale of assets or other corporate transaction, subject to appropriate confidentiality and legal safeguards.

5.1 If you do not provide requested information

Some personal data is required so that we can verify your identity, meet regulatory or legal obligations, assess whether services may be provided, operate your account or process transactions. If you do not provide information that is required for these purposes, we may be unable to open or maintain an account, process a transaction, provide a service or continue the relationship.

5.2 Consent and withdrawal

Where we rely on your consent, you may withdraw it at any time by using the relevant preference mechanism or contacting info@fxcg.com. Withdrawal does not affect processing already carried out lawfully before withdrawal, and it does not prevent us from continuing processing that is permitted or required on another lawful basis.

6. KYC, AML, Sanctions and Fraud Prevention

As a financial-services business, FXCG may be required or reasonably expected to identify and verify clients and connected persons, understand ownership and control, assess source of funds or wealth, monitor transactions, screen against sanctions or politically exposed person lists, detect unusual or suspicious activity and maintain records for compliance purposes.

For these purposes, we may verify information against documents you provide, public records, government or commercial databases and specialised verification or screening providers. We may also request updated information periodically or when there is a material change in your circumstances or activity.

Government-issued identifiers such as passport, national ID or driver-licence numbers will not be adopted as our general internal client identifier unless required or permitted by applicable law. They may, however, be recorded and used where reasonably necessary for identification, verification, regulatory reporting, fraud prevention or enforcement-related purposes.

Where required by law, we may restrict, delay or refuse transactions, suspend access, request additional information or report activity to competent authorities without giving advance notice where giving notice is prohibited.

7. Cookies and Online Technologies

Our websites, client portals and applications may use cookies and similar technologies to operate securely, remember preferences, understand usage and, where permitted, support analytics and marketing. Depending on the service and your location, these technologies may include:

- Strictly necessary technologies, used for authentication, security, fraud prevention, session management and core site functionality;
- Functional technologies, used to remember settings, language and other preferences;
- Analytics technologies, used to understand traffic, usage patterns, performance and how users interact with our digital services; and

- Advertising or marketing technologies, used where permitted to measure campaigns, attribute referrals and deliver or evaluate relevant marketing.

Where applicable law requires consent for non-essential cookies or similar technologies, we will seek consent before using them. You may be able to manage preferences through a cookie banner or preference centre where available, or through your browser or device settings. Disabling certain technologies may affect website or platform functionality.

Third-party providers may place or read cookies or similar identifiers when they provide analytics, security, payment, communication or marketing services to us. Their processing may also be governed by their own privacy notices.

8. Direct Marketing and Communications

Where permitted by applicable law, we may use your contact details and relevant profile information to tell you about FXCG products, services, educational content, events, promotions or related opportunities that may be of interest to you. We may tailor communications based on your relationship with us, preferences, location, account activity or prior interactions, subject to applicable law.

You can opt out of marketing at any time by using an unsubscribe mechanism in the message, changing available communication preferences, or contacting info@fxcg.com. Opting out of marketing does not stop service, security, transaction, regulatory or other non-promotional communications that are necessary for your account or relationship with us.

9. How We Share Personal Data

We do not disclose personal data more broadly than reasonably necessary for the purposes described in this Policy. Depending on the circumstances, we may share personal data with:

- FXCG group entities, where necessary to provide services, operate shared systems, manage group risk, support clients, conduct compliance activities or administer group operations;
- banks, payment service providers, payment processors and financial institutions involved in deposits, withdrawals or other account transactions;
- identity-verification, KYC, AML, sanctions-screening, fraud-prevention and risk-management service providers;
- cloud hosting, data storage, cybersecurity, communications, CRM, customer-support, analytics, software and technology service providers;
- auditors, accountants, lawyers, consultants, insurers and other professional advisers who are subject to professional or contractual confidentiality obligations;
- introducing brokers, affiliates, agents or referrers where you have a relationship with them and disclosure is necessary to administer that relationship, provide support or meet contractual obligations, subject to applicable law and appropriate limitations;
- regulators, financial intelligence units, tax authorities, law-enforcement agencies, courts, tribunals and other public authorities where disclosure is required or permitted by law or is reasonably necessary to protect rights, prevent harm or support an investigation; and
- potential or actual purchasers, investors, lenders or transaction advisers in connection with a corporate transaction, subject to confidentiality and applicable legal requirements.

Service providers that process personal data on our behalf are expected to use it only for authorised purposes and to apply appropriate confidentiality, security and data-protection measures. Some recipients may act as independent controllers under applicable law, in which case their own privacy notices may also apply.

10. International Data Transfers

FXCG operates internationally and uses service providers in multiple jurisdictions. As a result, personal data may be accessed, processed, hosted or stored in countries outside your country of residence, including countries that may have different data-protection laws.

Where applicable law restricts international transfers of personal data, we take steps designed to ensure an appropriate level of protection. Depending on the jurisdiction and transfer, these measures may include contractual protections, transfer agreements or standard contractual clauses, recognised adequacy mechanisms, intra-group arrangements, consent where legally valid, or other safeguards permitted by law.

You may contact info@fxcg.com to request further information about the safeguards that apply to a relevant transfer, subject to legal, confidentiality and security limitations.

11. Data Retention

We retain personal data only for as long as reasonably necessary for the purposes for which it was collected, including to provide services, maintain business and transaction records, meet legal and regulatory obligations, resolve disputes, prevent fraud and establish or defend legal claims.

Retention periods vary according to the type of information and the legal and operational context. In deciding how long to retain data, we may consider:

- any minimum or maximum period required by financial-services, AML/CFT, tax, company-record, regulatory or other applicable laws;
- how long an account or business relationship remains active and whether information is needed to provide ongoing services;
- the nature, sensitivity and volume of the data, and the risk of harm from unauthorised use or disclosure;
- limitation periods, complaint-handling periods, expected disputes, investigations, audits or regulatory enquiries;
- security, fraud-prevention and incident-investigation needs; and
- whether the purpose can be achieved using aggregated, anonymised or de-identified information instead.

When personal data is no longer required, we take reasonable steps to delete, destroy or de-identify it securely, unless continued retention is required or permitted by law.

12. Data Security

We use technical and organisational measures designed to protect personal data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure or access. These measures may include access controls, authentication, encryption in transit where appropriate, network security, malware protection, logging and monitoring, secure development and change controls, staff confidentiality obligations, employee training, physical safeguards and vendor risk management.

Access to personal data is limited to personnel and service providers who need it for authorised business purposes. We review security measures periodically and adjust them based on changes in technology, threats, business operations and legal requirements.

No method of transmission or storage is completely secure. If a personal-data incident occurs, we will investigate and take appropriate containment and remediation steps and, where required by applicable law, notify affected individuals and competent authorities.

13. Your Privacy Rights

Depending on the law that applies to you and subject to legal exceptions, you may have one or more of the following rights in relation to your personal data:

- Access: request confirmation of whether we process your personal data and obtain access to relevant information or a copy.
- Rectification: ask us to correct inaccurate information or complete information that is incomplete.
- Erasure: ask us to delete personal data in circumstances where applicable law gives you that right.
- Restriction: ask us to limit certain processing while an issue is being considered or where the law otherwise provides this right.
- Objection: object to processing based on legitimate interests or to direct marketing, where applicable.
- Data portability: receive certain personal data in a structured, commonly used and machine-readable format, or ask that it be transferred to another controller, where applicable.
- Withdraw consent: withdraw consent at any time where processing is based on consent.
- Automated decisions: request information, human review or other safeguards in relation to certain solely automated decisions that produce legal or similarly significant effects, where applicable.
- Complaint: raise a privacy complaint with us and, where available, with the competent data-protection or regulatory authority in your jurisdiction.

To exercise a privacy right, contact info@fxcg.com and provide enough information for us to understand and verify your request. We may request proof of identity or authority before acting on a request. We will respond within the period required by applicable law and will explain any lawful refusal or limitation where required.

Some rights are not absolute. We may retain or continue to process information where necessary to comply with legal obligations, prevent fraud, protect the rights and safety of others, preserve legal privilege, maintain regulatory records or establish, exercise or defend legal claims.

13.1 Keeping information accurate

Please keep your contact, identification, tax, financial and other relevant information current. We may ask you to refresh or verify information periodically, particularly where required for KYC, AML, security or regulatory purposes.

14. Automated Decision-Making and Profiling

We may use automated tools to assist with activities such as identity verification, fraud detection, transaction monitoring, sanctions screening, cybersecurity, risk management, service analytics and the personalisation of communications. These tools may generate risk indicators, alerts, scores or recommendations for review.

Where we make a decision based solely on automated processing that produces legal or similarly significant effects and applicable law gives you specific rights, we will provide the information and safeguards required by law. These may include the ability to request human intervention, express your point of view or challenge the decision, subject to legal and security limitations.

15. Children and Minors

FXCG trading and account services are not intended for individuals under 18 years of age, or any higher minimum age that may apply in a particular jurisdiction. We do not knowingly open trading accounts for persons who do not meet the applicable age requirement. If we become aware that personal data has

been collected from an ineligible minor without a lawful basis, we will take appropriate steps to delete or otherwise handle that information in accordance with applicable law.

16. Third-Party Links and Services

Our websites, applications or communications may contain links to third-party websites, platforms, payment services, social media services or other external services. FXCG does not control the privacy practices of independent third parties. You should review their privacy notices before providing personal data to them. Where a third party processes information on our behalf, that processing is addressed under Section 9 of this Policy.

17. Complaints and Contact

If you have a question about this Policy, want to exercise a privacy right, wish to withdraw consent or opt out of marketing, or want to make a privacy complaint, please contact:

Entity	FXCG Group Limited
Email	info@fxcg.com
Website	www.fxcg.com
Registered Address	No. 9 Cassius Webster Building, Grace Complex, PO Box 1330, The Valley, AI-2640, Anguilla

We will investigate privacy complaints and respond as required by applicable law. If you remain dissatisfied, you may have the right to complain to the data-protection, privacy or regulatory authority with jurisdiction over your matter.

18. Changes to this Policy

We may update this Policy from time to time to reflect changes in our services, systems, business practices, legal obligations or regulatory expectations. The current version will be made available through our website or other appropriate channel, together with its effective date. Where required by applicable law, we will provide additional notice of material changes before they take effect.

This Policy is reviewed at least annually and may be reviewed sooner where a material change requires it.

FXCG Group Limited | Privacy Policy | Effective 8 August 2026