

# Privacy Statement

XP Solutions Limited (“XPS” or “we” or “our”) is committed to protecting and respecting Your privacy. This Privacy Statement sets out the basis on which any personal data we collect from You, or that You provide to us, will be processed by us. It applies to our [www.finfxtech.com](http://www.finfxtech.com) website (the “Website”) along with the products and services provided to You when You visit the Website;

## Collection of personal information

We collect information required to open an eWallet, transact business effectively and to safeguard Your assets and Your privacy. To do this, we gather information to help us assess Your needs and preferences.

The information we collect directly from You includes information required to comply with the AML and KYC practices and FAFT standards. This information may include without limitation Your name, address, telephone number, e-mail address. We also collect birth date and Your location information.

## Usage of personal information

We only use personal information as appropriate to provide You with a high quality of service and security. For example, we may use the information collected from You to verify Your identity and contact information. We may also use this information to establish and set up Your eWallet, issue an eWallet number and a secure password, maintain Your eWallet activity, and contact You with eWallet information. This information helps us improve our services and inform You about new products, services or promotions that may be of interest to You.

## Our affiliates and partners

We may share information with affiliates if the information is required to provide the product or service You have requested, or to provide You with the opportunity to participate in the products or services our affiliates offer. We may also forge partnerships and alliances, which may include joint marketing agreements, with other companies who offer high-quality products and services that might be of value to our Customers. In order to ensure that these products and services meet Your needs and are delivered in a manner that is useful and relevant, we may share some information with partners,

affiliates and alliances. This allows them to better understand the offers that are most relevant and useful to Yourself. The use of your personal information is limited to the purposes identified in our relationship with the partner or affiliate.

## **Non-affiliated third parties**

We do not sell, license, lease or otherwise disclose Your personal information to any third party for any reason, except as described below.

We reserve the right to disclose Your personal information to third parties when required to do so by law to regulatory, law enforcement or other government authorities. We may also disclose Your information as necessary to credit reporting or collection agencies. We may also disclose Your information to non-affiliated third parties if it is necessary to protect the XPS's rights or property.

To help us improve our services to You, we may engage another business to help us to carry out certain internal functions such as eWallet processing, fulfillment, client service, client satisfaction surveys or other data collection activities relevant to our business. We may also provide a party with Customer information from our database to help us to analyze and identify Customer needs and notify Customers of product and service offerings. Use of the shared information is strictly limited to the performance of the task we request and for no other purpose. All third parties with which we share personal information are required to protect personal information in a manner similar to the way we protect personal information.

## **Restriction of responsibility**

If at any time You choose to purchase a product or service offered by another company, any personal information You share with that company will no longer be controlled under our Privacy Statement. We are not responsible for the privacy policies or the content of sites we link to and have no control of the use or protection of information provided by You or collected by those sites. Whenever You elect to link to a co-branded Web site or to a linked Web site, You may be asked to provide registration or other information. Please note that the information You are providing is going to a third party, and You should familiarize Yourself with the privacy policy provided by that third party.

## **Opting out of disclosure of non-public personal information**

You may direct us not to disclose non-public personal information to certain non-affiliated third parties. To opt out of sharing non-public personal information with non-affiliated third

parties, please contact a client service representative. An opt-out election must be made for each separate eWallet You hold with us.

## Use of cookies

We use cookies to assist us in securing Your activities and to enhance the performance of our Website. (Cookies are small text files sent from the Web server to Your computer.) Cookies used by us do not contain any personal information, nor do they contain eWallet or password information. They merely allow the site to recognize that a page request comes from someone who has already logged on.

We may share Website usage information about visitors to the Website with reputable advertising companies for targeting our Internet banner advertisements on this site and other sites. For this purpose, pixel tags (also called clear gifs or web beacons) may be used to note the pages You've visited. The information collected by the advertising company through the use of these pixel tags is not personally identifiable.

To administer and improve our Website, we may use a third party to track and analyze usage and statistical volume information including page requests, form requests, and click paths. The third party may use cookies to track behavior and may set cookies on behalf of us. These cookies do not contain any personally identifiable information.

## Communications

Unless otherwise indicated for a particular service, any communications or material of any kind that You e-mail or otherwise transmit through the services, including information, data, questions, comments or suggestions will be treated as non-proprietary and non-confidential.

By accepting our Terms of Use You agree for us to use Your Communications in any way we think fit, either on the Website or elsewhere, with no liability or obligation to You. We are free to use any idea, concept, know-how or technique or information contained in Your Communications for any purpose including, but not limited to, developing and marketing products.

We are entitled, but not obligated, to review or retain your Communications.

We may monitor your Communications to evaluate the quality of service You receive, Your compliance with our Terms of Use, the security of the Website, or for other reasons. You agree that such monitoring activities will not entitle You to any cause of action or other right with respect to the manner in which we monitor Your Communications. In no

event will we be liable for any costs, damages, expenses or any other liabilities incurred by You as a result of our monitoring activities.

## **Changes to this Privacy Statement**

From time to time, we may update this Privacy Statement. In the event we materially change this Privacy Statement, the revised Privacy Statement will promptly be posted to the Website and we will post a notice on our Website informing You of such changes. You agree to accept posting of a revised Privacy Statement electronically on the Website as actual notice to You. Any dispute over our Privacy Statement is subject to this notice and our Terms of Use. We encourage You to periodically check back and review this Statement so that You will always know what information we collect, how we use it, and to whom we disclose it. If you have any questions that this Statement does not address, please contact a Client Services representative.