



Privacy Policy

MEX GLOBAL MARKETS PTE. LTD.

UEN: 202029559G

Privacy Policy

Introduction

MEX Global Markets Pte Ltd (the “**Company**” and “**MEX**”) needs to collect personal data (defined below) from our clients and prospective clients in order to provide them with our products, services and any relevant information. Personal data refers to data, whether true or not, about an individual who can be identified either: (a) from that data; or (b) from that data and other information to which we have or are likely to have access.

Your privacy is very important to us and we make it our priority to safeguard and secure any and all personal data and other confidential information relating to individuals.

This Privacy Policy will go through what measures MEX takes to collect, use and manage the personal data we receive from you or a third party in relation to the products and services we provide. This Privacy Policy also outlines your rights relating to the processing of your personal data.

Our Privacy Policy is reviewed and updated regularly in order to be compliant with applicable data protection laws such as the Personal Data Protection Act 2012 and its subsidiary legislation (“**PDPA**”) and other applicable laws and regulations.

Overview

This Privacy Policy applies to personal data collected by MEX, including data collected via MEX’s website at <https://www.mexglobalmarkets.com> and all related domains and sub-domains (“**Website**”).

Privacy Protection

MEX respects the privacy of any users who access its Website, and therefore is committed to taking all reasonable steps to safeguard the privacy and confidential information of all clients and visitors of our Website, in accordance with the applicable data protection laws and regulations.

To ensure this, we have trained our staff on the importance of protecting and respecting your personal data and privacy. We have also appointed a Data Protection Officer to ensure that our Company manages and processes your personal data in compliance with the applicable data protection laws and regulations and in accordance with this Privacy Policy.

The personal data you provide us with when registering yourself as a user of the Company’s Website or of its services is classified as registered information, which is protected in several different ways. You can access your registered information after logging in to My MEX.

It is your responsibility to make sure that your password is only known to you and not disclosed to anyone else. Your registered information is securely stored with us, and only authorized staff have access to this information. Please also note that transfer of information via the internet is not always entirely secure, but we have taken reasonable precautions to assure that your personal data is being protected.

Privacy Policy

Personal Data We Collect

As part of our application process and in order to open any type of account with us, you must first complete and submit an application form with all the required information. By completing this application form, you are requested to disclose personal data in order to enable the Company to assess your application and comply with the relevant laws (including their regulations, notices and guidelines). The information you provide may also be used by the Company to inform you regarding its services.

The information that we may collect from you includes the following:

- full name
- residential address
- contact details (e.g. telephone number, email address, etc.)
- date of birth, place of birth, gender, citizenship
- information about your income and wealth, including details about your source of funds, assets and liabilities, bank account information, trading statements, financial statements
- trading account balances, trading activity, your inquiries and our responses
- profession and employment details
- authentication data (e.g. signature)
- location data
- trading performance, knowledge and experience
- verification information, which includes information necessary to verify your identity such as a passport or driver's license (examples also include background information we receive about you from public records or from other entities not affiliated with us). Furthermore, we may collect other identifiable information, such as identification numbers and/or passport/tax registration numbers
- any other information customarily used to identify you and about your trading experience which is relevant to us providing our services to you.

We obtain this information in a number of ways through your use of our services, including through any of our websites, apps, and the account opening applications, our demo account forms or customer service communications. We may also collect this information about you from third parties such as your payment providers and through publicly available sources. We also keep records of your trading behaviour, including records regarding the following:

- products you trade with us and their performance
- historical data about the trades and investments you have made, including the amount invested
- your preference for certain types of products and services

If you choose not to provide the information, which we need to fulfil your request for a specific product or service, we may not be able to provide you with the requested product or service.

Privacy Policy

We may record any communications, electronic, by telephone, in person or otherwise, that we have with you in relation to the services we provide to you and our business relationship with you. These recordings will be our sole property and will constitute evidence of the communications between us. To the extent permitted by law, such telephone conversations may be recorded without the use of a warning tone or any other further notice.

Processing of Your Personal Data

We may collect and process your personal data on the following bases and for the following purposes:

1. Performance of a contract

We process personal data in order to provide our services and products, as well as information regarding our products and services based on the contractual relationship with our clients (i.e. so as to perform our contractual obligations). In addition, processing of personal data takes place to be able to complete our client on-boarding/acceptance procedures.

In view of the above, we need to verify your identity in order to accept you as our client and we will need to use those details in order to effectively manage your trading account with us. This may include third parties carrying out credit or identity checks on our behalf. The use of your personal data is necessary for us to know who you are as we have a legal obligation to comply with 'Know Your Customer' and customer due diligence' regulatory obligations.

2. Compliance with a legal obligation

There are a number of legal obligations imposed by relevant laws to which we are subject, as well as specific statutory requirements (e.g. anti-money laundering laws, financial services laws, company laws, data protection laws and tax laws). There are also various supervisory authorities whose laws and regulations apply to us. Such obligations and requirements impose on us obligations to conduct necessary personal data processing activities for credit checks, identity verification, payment processing, compliance with court orders, tax law or other reporting obligations and anti-money laundering controls. As such, MEX may share your personal data within MEX for the purpose of updating/verifying your personal data where needed to comply with the relevant anti-money laundering compliance frameworks.

These obligations apply at various times, including client on-boarding/acceptance, payments and systemic checks for risk management.

3. For the purposes of safeguarding legitimate interests

We process personal data so as to safeguard the legitimate interests pursued by us or by a third party to the extent permitted by law. A legitimate interest covers any lawful interests of MEX or other persons (including other organisations), including when we have a business or commercial reason to use your information and such interests outweigh any adverse effect to the individual(s) whose personal data is concerned. Examples of such processing activities include the following:

- initiating legal claims and preparing our defence in litigation procedures

Privacy Policy

- risk management
- measures to manage business and for further developing products and services
- measures to ensure IT and system security, preventing potential crime, asset security, admittance controls and anti-trespassing measures

4. You have provided your consent

Our collection, processing, storage, use and disclosure of your personal data is based on your consent (other than for the reasons described or implied in this policy when your consent is not required). You may revoke consent at any time; however, any processing of personal data prior to the receipt of your revocation will not be affected.

5. To provide you with products and services, or information about our products and services, and to review your ongoing needs.

Once you successfully open a trading account with us, or subscribe to an update, we will need to use your personal data to perform our services and comply with our obligations to you. We also seek to ensure that we are providing the best products and services, so we may periodically review your needs based on our assessment of your personal data to try to ensure that you are getting the benefit of the best possible products and services from us.

6. To investigate or settle enquiries or disputes

We may need to use personal data collected from you to investigate issues or to settle disputes with you because it is in our legitimate interests to ensure that issues and disputes get investigated and resolved in a timely and efficient manner.

7. To comply with applicable laws, court orders, other judicial process, or the requirements of any applicable regulatory authorities

We may need to use your personal data to comply with any applicable laws and regulations, court orders or other judicial process, or the requirements of any applicable regulatory authority. We do this not only to comply with our legal obligations but because it may also be in our legitimate interest to do so.

8. Data analysis

Our webpages and emails may contain web beacons or pixel tags or any other similar type of data analysis tools that allow us to track receipt of correspondence and count the number of users that have visited our webpage or opened our correspondence. We may aggregate your personal data (such as trading history) with the personal data of our other clients on an anonymous basis. If your personal data is not in an anonymized form, we may continually evaluate that personal data to ensure that the products and services we provide are relevant to the market.

9. Marketing purposes

We may use your personal data to send you marketing communications by email, phone, SMS or other methods (such as social media channels) to ensure that you are kept up to date with our

Privacy Policy

latest products and services. We will not disclose your information to any outside parties that may allow them to directly market to you.

10. Internal business purposes and record keeping

We may use your personal data for internal business and research or record keeping purposes. Such processing is in our own legitimate interests and is required in order to comply with our legal obligations. This may include any communications that we have with you in relation to the services and products we provide to you. We will also keep records to ensure that you comply with your contractual obligations pursuant to the agreement governing our relationship with you.

11. Legal Notifications

Often the law requires us to advise you of certain changes to products or services or laws. We may need to inform you of changes to the terms or the features of our products or services. We need to process your personal data to send you these legal notifications. You will continue to receive this information from us even if you choose not to receive direct marketing information from us.

12. Physical security

If you enter any of our premises we may record your image on our CCTV for security reasons. We may also take your details to keep a record of who has entered our premises on any given day. It is in our legitimate interest to do this to maintain a safe and secure working environment.

Disclosure of Your Personal data

The Company will not disclose any of its clients' personal data or confidential information to a third party, except: (a) to the extent that it is required or permitted to do so pursuant to any applicable laws, rules or regulations; (b) if there is a duty to disclose; (c) if our legitimate business interests require disclosure; or (d) at your request or with your consent or to persons, entities or organisations described in this policy. The Company will endeavour to make such disclosures on a 'need-to-know' basis, unless otherwise instructed by a governmental or regulatory authority. Under such circumstances, the Company will notify the third party regarding the confidential nature of any such information.

As part of using your personal data for the purposes set out above, the Company may disclose your personal data to the following:

- any companies under the MEX group of companies (each a "**MEX Group Company**"), meaning any of our related corporations including our ultimate holding companies and their respective subsidiaries may receive such information;
- our associates and service providers, for business purposes, including third parties such as business service providers and specialist advisers who have been contracted to provide us with administrative, financial, legal, tax, compliance, insurance, research or other services;
- business introducers with whom we have a mutual business relationship;

Privacy Policy

- business parties, credit providers, courts, tribunals and regulatory authorities as agreed or authorised by law; and
- anyone authorised by you.

If the Company discloses your personal data to business parties, such as card or other payment processing companies or banks, in order to perform the services requested by clients, such third parties may store your information in order to comply with their legal and other obligations.

Clients accept and consent that the Company may, from time to time, analyze the data collected while visiting our Website(s) or by other means, such as questionnaires, for statistical purposes in order to improve the Company's business activities.

Transfers Outside of Singapore or the European Economic Area

We may transfer your personal data outside Singapore, or you are residing in Europe, outside of the European Economic Area (**EEA**), to other MEX Group Companies as well as service providers (i.e. processors) who are engaged on our behalf. To the extent we transfer your information outside Singapore or the EEA, we will ensure that the transfer is lawful and that processors in third countries are obliged to comply with the PDPA or European data protection laws (as applicable) and that the laws in the country of such processors are comparable and provide appropriate safeguards in relation to the transfer of your data in accordance with Section 26 of the PDPA and/or GDPR Article 46 (as applicable).

By submitting your personal data, you consent to your personal data being processed by staff of MEX operating outside Singapore or the EEA (as applicable) who work for us. Such staff may be, among others, engaged in the fulfilment of your requests, the processing of your payment details and the provision of support services. The Company will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this Privacy Policy.

Your Collected Information

Tracking systems used on the Company's Website may collect your personal data in order to optimize the services provided to clients/potential clients. The Website collects information in the following ways:

1. Device Information

By recognizing your device used to access and use the Company's Website, we can provide you with the most appropriate version of our Website.

2. Log Information

Logging certain behaviours on our Website enables the Company to track user action and therefore troubleshoot any issues that may occur.

Privacy Policy

3. Location Information

Using your IP address helps us localize our Website content, which we provide to you based on your country, and improve your user experience on our Website.

4. Cookies

Cookies are small pieces of data sent from our Website to your browser and stored on your computer's hard drive when using our Website, and they may include a unique identification number. The purpose of collecting this information is to provide you with a more relevant and effective experience on our Website, including the presentation of our web pages according to your needs or preferences.

Cookies are frequently used on many websites on the internet, and you can choose if and how a cookie will be accepted by changing your preferences and options in your browser. You may not be able to access some parts of our Website if you choose to disable the cookie acceptance in your browser, particularly in your MyMEX account panel and other secure parts of our Website. We therefore recommend you to enable cookie acceptance in order to benefit from all our online services.

Furthermore, we use cookies for re-marketing features in order to allow us to reach out to users who have previously visited our Website and have shown an interest in our products and services. Periodically, we may use third party vendors to display our ads over the internet to you, based on your previous use of our Website. You can opt out this particular use of cookies at any time by visiting Google's Ads Settings page and the DoubleClick opt-out page or as they later update those facilities.

The Company uses session ID cookies and persistent cookies. A session ID cookie expires after a set amount of time or when the browser window is closed. A persistent cookie remains on your hard drive for an extended time period. You can remove persistent cookies by following directions provided in your web browser's 'Help' file.

For further details about our cookie policy and how our cookies work, read our Cookies Policy.

How We Obtain Your Consent

If our use of your personal data requires your consent, such consent will be provided in accordance with the express written terms which govern our business relationship (which are available on our website(s), as amended from time to time), or any other contract we may have entered into with you or as set out in our communication with you from time to time.

If we rely on your consent as our legal basis for collecting, holding, processing or disclosing your personal data, you have the right to withdraw that consent at any time by submitting a request in writing using the contact details set out in this Privacy Policy.

Upon receipt of your written request to withdraw your consent, we may require reasonable time (depending on the complexity of the request and its impact on our relationship with you) for your request to be processed and for us to notify you of the consequences of us acceding to the same,

Privacy Policy

including any legal consequences which may affect your rights and liabilities to us. In general, we shall seek to process your request within ten (10) business days of receiving it.

Please note that depending on the nature and scope of your request, we may not be able to continue providing our services and products to you and we shall, in such circumstances, notify you before completing the processing of your request. Should you decide to cancel your withdrawal of consent, please inform us in writing using the contact details set out in this Privacy Policy.

Please note that withdrawing consent does not affect our right to continue to collect, use and disclose personal data where such collection, use and disclosure without consent is permitted or required under applicable laws.

Storage of Your Personal data and Retention Period

In relation to your personal data, we will hold this for as long as we have a business relationship with you, in a combination of secure computer storage facilities and paper-based files and other records and we take the necessary measures to protect the personal data we hold from misuse, loss, unauthorized access, modification or disclosure.

When we consider that personal data is no longer necessary for the purpose for which it was collected, we will remove any details that will identify you or we will securely destroy the records. However, we may need to maintain records for a significant period of time (after you cease being our client). For example, we are subject to certain anti-money laundering laws which require us to retain the following, for a period of 5 years after our business relationship with you has ended:

- a copy of the documents we used in order to comply with our customer due diligence obligations;
- supporting evidence and records of transactions with you and your relationship with us

Also, the personal data we hold in the form of a recorded communication, by telephone, electronically, in person or otherwise, will be held in line with local regulatory requirements (i.e., 5 years after our business relationship with you has ended or longer if you have legitimate interests (such as handling a dispute with you). If you have opted out of receiving marketing communications, we will hold your details on our suppression list so that we know you do not want to receive these communications.

We may keep your data for longer than 5 years if we cannot delete it for legal, regulatory or business reasons.

Your Rights Regarding Your Personal data

1. Information and access

You have the right to request for a copy of the personal data which we hold about you, or information about the ways in which we use or disclose your personal data, by submitting your request in writing to our Data Protection Officer at the contact details provided below. Please note

Privacy Policy

that a reasonable fee may be charged for an access request. If so, we will inform you of the fee before processing your request.

We will respond as soon as reasonably possible. Should we not be able to respond within thirty (30) days from the date of your request, we will inform you in writing within thirty (30) days after receiving your request. If we are unable to provide you with any personal data, we shall generally inform you of the reasons why we are unable to do so (except where we are not required to do so under the PDPA).

2. Rectification

We will take all reasonable steps to make sure that your personal data remains accurate, complete and up-to-date. If the personal data we hold about you is inaccurate or incomplete, you are entitled to have it rectified. If we have disclosed your personal data to others, we will let them know about the rectification where possible. You may inform us at any time that your personal details have changed by e-mailing us at cs@mexglobalmarkets.com. The Company will change your personal data in accordance with your instructions. To proceed with such requests, in some cases we may need supporting documents from you as proof, i.e. personal data that we are required to keep for regulatory or other legal purposes.

We will respond as soon as reasonably possible. Should we not be able to respond within thirty (30) days from the date of your request, we will inform you in writing within thirty (30) days after receiving your request. If we are unable to make a correction requested by you, we shall generally inform you of the reasons why we are unable to do so (except where we are not required to do so under the PDPA).

3. Erase

You can ask us to delete or remove your personal data in certain circumstances such as if we no longer need it or you withdraw your consent (if applicable) provided that we have no legal obligation to retain that data. Such request will be subject to any retention limits we are required to comply with in accordance with applicable laws and regulations. If we have disclosed your personal data to others, we will let them know about the erasure where possible.

4. Processing restrictions

You can ask us to 'block' or suppress the processing of your personal data in certain circumstances such as if you contest the accuracy of that personal data or object to us processing it. It will not stop us from storing your personal data. We will inform you before we decide not to agree with any requested restriction. If we have disclosed your personal data to others, we will inform about the restriction if possible.

5. Data portability

Under the General Data Protection Regulation (679/2016) or other applicable laws, you may have the right, in certain circumstances, to obtain personal data you have provided us with (in a

Privacy Policy

structured, commonly used and machine readable format) and to re-use it elsewhere or ask us to transfer this to a third party of your choice.

6. **Objection**

You can ask us to stop processing your personal data, and we will do so, if we are:

- relying on our own or someone else's legitimate interests to process your personal data except if we can demonstrate compelling legal grounds for the processing;
- processing your personal data for direct marketing; or
- processing your personal data for research unless we reasonably believe such processing is necessary or prudent for the performance of a task carried out in the public interest (such as by a regulatory or enforcement agency).

7. **Opt-out of submitting your personal data**

If you do not want us to use your personal data, you must inform the Company by sending an email to cs@mexglobalmarkets.com. If you decide to do so, we may not be able to continue to provide information, services and/or products requested by you and we will have no liability to you in this respect.

Legal Disclaimer

The Company may disclose your personally identifiable information as required by applicable laws and regulations and if the Company believes that disclosure is necessary to protect our rights or to comply with other proceedings, courts, legal process served or pursuant to governmental, intergovernmental or other regulatory bodies. The Company is not liable for misuse or loss of personal data or otherwise on the Company's website(s) that the Company does not have access to or control over. The Company will not be liable for unlawful or unauthorized use of your personal data due to misuse or misplacement of your passwords, negligent or malicious intervention or otherwise by you or due to your acts or omissions or a person authorized by you (whether or not that authorization is permitted by the terms of our legal relationship with you).

How to Contact Us

If you have any questions or concerns regarding this Privacy Policy, please e-mail our Data Protection Officer at cs@mexglobalmarkets.com.

Effect of Privacy Policy and Changes to Privacy Policy

This Privacy Policy applies in conjunction with any other notices, contractual clauses and consent clauses that apply in relation to the collection, use and disclosure of your personal data by us.

We may revise this Privacy Policy from time to time without any prior notice. You may determine if any such revision has taken place by referring to the date on which this Privacy Policy was last

Privacy Policy

updated. Your continued use of our Website and/or services constitutes your acknowledgement and acceptance of such changes.

Effective date: 8 June 2022

Last updated: 8 June 2022