

### PRIVACY NOTICE

As part of our day-to-day business we may collect, use, and disclose your personal information in accordance with this Privacy Notice.

Your privacy is important to us and it is our policy to respect the confidentiality of information and the privacy of individuals. This notice outlines how we manage your personal information supplied to us by you or a third party in connection with our provision of services to you or which we collect from your use of our services and/or our app(s) or website(s). It also details your rights in respect of our processing of your personal information.

Our privacy notice will be reviewed from time to time to take account of new obligations and technology, changes to our operations and practices and to make sure it remains appropriate to the changing environment. Any personal information we hold will be governed by our most current privacy notice.

Please note that if you are a FX Publications, Inc. d/b/a DailyFX employee, a contractor of DailyFX or a third party service provider, your personal information will be used in connection with your employment contract, your contractual relationship or in accordance with our separate policies which are available by contacting us. Any reference to 'us', 'our', 'we', or 'DailyFX' in this privacy notice is a reference to FX Publications, Inc. d/b/a DailyFX.

Any reference to "IG Group" or "IG" in this privacy notice is a reference to each group company within the IG Group and each IG Group affiliate as the context requires unless otherwise stated.

Similarly, any reference to 'you', 'your', 'yours' or 'yourself' in this privacy notice is a reference to any of our customers and potential customers as the context requires unless otherwise stated.

### WHO WE ARE?

This privacy notice applies to the processing activities of

- FX Publications, Inc. (a corporation registered in the state of Delaware USA with file number 6153213 and whose registered address is 251 Little Falls Drive, Wilmington, Delaware 19808, and whose principal place of business is located at 19 North Sangamon Street, Chicago, IL 60607), a financial market news and commentary provider based in the United States.

### WHAT KIND OF PERSONAL INFORMATION DO WE COLLECT ?

To use certain services or products provided by DailyFX, DailyFX may collect, use and disclose the following categories of information about you:

- Identifiers:** name, email address, unique personal identifier, online identifier, Internet Protocol (IP) address;
- Customer Records Information:** name, phone number;
- Commercial Information:** content viewed by you, content preferences, and other information regarding how you interact with DailyFX and the content or services it provides;
- Internet or Other Electronic Network Activity Information:** browser types, browsing history, search history, device identifier, ISPs, operating systems, page visits, timestamps, usage, data from cookies, pixel tags, web beacons, and information regarding your interaction with the DailyFX website and other locations where DailyFX provides content, registrations, or advertisements;
- Geolocation Data**
- Audio, Electronic, Visual, or Similar Communication Information**
- Inferences drawn from other personal information: profile information reflecting a person's preferences, characteristics, predispositions, and abilities.
- Any other similar information to the above

We obtain the personal information listed above from the following categories of sources: from you, directly and indirectly, and from our service providers, business partners, affiliates, social media networks, and advertising networks. We obtain this information in a number of ways through your use of our services or other dealings with us including through any of the DailyFX websites, apps, webinar sign up forms, educational downloads request forms, subscribing to news updates, signing up for a sweepstakes, contests or other promotions, surveys and market research, from information provided in the course of customer service correspondence, and from observing your actions on our website or mobile app. We may also collect this information about you from third parties.

Additionally, we may obtain personal information about you through your use of our websites, apps or through the use of cookies on our websites and/or apps, in particular by recording which pages you look at on our websites.

When you use or connect to the DailyFX website or download a mobile app by or through a third party platform, such as Facebook or other social networking site, you allow us to access and/or collect certain information from your third party platform profile/account (such as your Facebook account) or via any cookies placed on your device by such third party platform as permitted by the terms of the agreement and your privacy settings with the third party platform. We will share such information with the third-party platform for their use as permitted by the terms of the agreement and your privacy setting with the third-party platform.

Information collected pursuant to this privacy notice may be transferred outside of the United States and stored by IG Markets Limited in the United Kingdom, in accordance with applicable UK law. IG Markets Limited is registered in England and Wales with company number 04008957, Information Commission No. Z4707095, and registered office at Cannon Bridge House, 25 Dowgate Hill, London EC4R 2YA.

### OUR BUSINESS PURPOSE FOR COLLECTING PERSONAL INFORMATION

We may use or disclose the personal information we collect for one or more of the following business purposes:

- To fulfill or meet the reason you provided the information. For example, to provide you information about potential products you request.
- To provide, support, personalize, and develop our DailyFX website or mobile app, products, and services.
- To create, maintain, customize, and secure your account with us.
- To process your requests.
- To provide you with support and to respond to your inquiries, including to investigate and address your concerns and monitor and improve our responses.
- To personalize your website or app experience and to deliver content and product and service offerings relevant to your interests, including targeted offers through our DailyFX website or mobile app, third-party sites, and via email or text message (with your consent, where required by law).
- To help maintain the safety, security, and integrity of our DailyFX website or mobile app, products and services, databases and other technology assets, and business.

- For testing, research, analysis, and product development, including to develop and improve our websites, app, products and services.
- To respond to law enforcement requests and as required by applicable law, court order, or governmental regulations.
- As described to you when collecting your personal information or as otherwise set forth in the CCPA.
- To evaluate or conduct a merger, divestiture, restructuring, reorganization, dissolution, or other sale or transfer of some or all of DailyFX's assets, whether as a going concern or as part of bankruptcy, liquidation, or similar proceeding, in which personal information held by DailyFX about our DailyFX website or mobile app users is among the assets transferred.

We may ask for other personal information voluntarily from time to time (for example, through market research, surveys or special offers, download or webinar registrations). If you choose not to provide the information 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.

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 relationship with you. These recordings will be our sole property and will constitute evidence of the communications between us. Such telephone conversations may be recorded without the use of a warning tone or any other further notice.

Further, if you visit any of our offices or premises, we may have CCTV which will record your image.

### WHICH AFFILIATED & NON-AFFILIATED THIRD PARTIES MAY WE DISCLOSE PERSONAL INFORMATION TO?

As part of using your personal information for the business purposes set out above, we may disclose your information with both IG Group and its affiliates and non-affiliated third parties.

#### Disclosures of personal information for a business purpose:

In the preceding twelve (12) months, DailyFX has disclosed the following categories of personal information for a business purpose to the following categories of affiliates and non-affiliated third parties:

- Identifiers
- Customer Records Information
- Internet or Other Electronic Network Activity Information

Specifically, we may disclose your personal information with affiliates within the IG Group, and its subsidiary entities, who provide technological services, marketing, compliance, account management, and other services that may be of interest to you. This will involve transfer of personal information to the EU and you can find out more about how such personal information is treated here:

<https://www.IG.com/UK/privacy>. We may also disclose non-identifiable information for the same reasons we might share personal information, with affiliates for their own analysis and research, to facilitate targeted content and ads, and to analyze the effectiveness of those ads.

Additionally, we may share information with non-affiliated third parties which include both financial service providers and non-financial companies. We may disclose all of the information we collect, to companies that perform marketing services on our behalf or to other financial institutions with whom we have joint marketing agreements. We may also disclose all of the information we collect to other non-affiliated third parties for our everyday business purposes, such as to process requests, maintain account(s), respond to court orders and legal investigations, offer our own products and services, protect against fraud, for institutional risk control, to perform services on our behalf, and as otherwise required or permitted by law.

#### Types of non-affiliated third parties that your personal information may be shared with:

- Service providers and specialist advisers who have been contracted to provide us with administrative, IT, financial, compliance, insurance, research or other services
- Entities with whom we have a mutual relationship

- Credit providers, courts, tribunals and applicable regulatory authorities as agreed or authorized by law or our agreement with you
- Anyone authorized by you

Generally, we require that organizations outside the IG Group who handle or obtain personal information enter into a contractual agreement requiring it to maintain the confidentiality of this information, prohibiting it from using or disclosing your information, except for the limited purpose and to the persons for whom disclosure was intended or otherwise permitted by law, and to comply with the all relevant data protection laws and this privacy notice.

Please note that the use of your personal information by external third parties who act as data controllers of your personal information is not covered by this privacy notice and is not subject to our privacy standards and procedures.

### CALIFORNIA RESIDENTS RIGHTS REGARDING PERSONAL INFORMATION

If you are a California resident, you have certain rights with regard to your personal information:

- You have the right to request, up to two times every 12 months, (i) the categories of personal information we have collected about you; (ii) the categories of sources from which we have collected personal information about you; (iii) the business or commercial purpose for collecting or selling your personal information; (iv) the categories of third-parties with whom we share personal information; (v) the specific pieces of personal information we have collected about you; (vi) the categories of personal information that we have sold about you and the categories of third-parties to whom the personal information was sold; (vii) the categories of personal information that we have disclosed about you for a business purpose and the categories of third-parties to whom the personal information was disclosed for a business purpose;
- You have the right to request that we delete your personal information that we collected from you and retained, subject to certain exceptions allowed under applicable law;
- You have the right to opt-out of the sale of your personal information to third parties by sending an email request to [compliance.us@ig.com](mailto:compliance.us@ig.com).
- You have the right not to be discriminated against for exercising your rights under the California Consumer Privacy Act.

To submit a consumer request, please contact [compliance.us@ig.com](mailto:compliance.us@ig.com). Only you, or a person registered with the California Secretary of State that you authorize to act on your behalf (an "Authorized Representative"), may make a consumer request related to your personal information. You may also make a consumer request on behalf of your minor child. We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you. The verifiable consumer request must:

- Provide sufficient information that allows us to reasonably verify you are the person about whom we collected personal information or an Authorized Representative. Before completing your request to exercise the below, we will verify that the request came from you by asking you one or more knowledge-based questions about you.
- Describe your request with sufficient detail that allows us to properly understand, evaluate, and respond to it.

We cannot respond to your request or provide you with personal information if we cannot verify your identity or authority to make the request and confirm the personal information relates to you.

### HOW DO WE OBTAIN YOUR CONSENT & HOW DO YOU OPT-OUT OF INFORMATION SHARING?

As discussed above, we may disclose your personal information with our affiliates and non-affiliated third parties. You may limit or opt-out of affiliate sharing or certain non-essential disclosures at any time by contacting us at [compliance.us@ig.com](mailto:compliance.us@ig.com) and specifying from which activity you wish to opt-out. Your choice to opt-out of affiliate sharing, analytics, or non-essential purposes does not limit our ability to collect and disclose information about you, under the terms of this Privacy Policy, for other vendors.

Additionally, you may opt-out of direct marketing emails and/or text messages by responding to the communication with "unsubscribe" (emails) or "STOP" (text messages).

In the preceding twelve (12) months, DailyFX has sold, as that term is contemplated by the California Consumer Privacy Act, the following categories of personal information to its affiliated third parties:

- Identifiers
- Customer Records Information

By following the opt-out procedures, you may limit the extent to which we share with our affiliates personal information that you have provided to us or that we may obtain from third parties ("eligibility information"). Eligibility information does not include your identification information or personal information pertaining to our transactions or experiences with you. Please note that, even if you direct us not to share eligibility information with our affiliates, we may still share your personal information, including eligibility information, with our affiliates under circumstances that are permitted under applicable law, such as to process transactions or to service your account.

### MANAGEMENT OF PERSONAL INFORMATION

We always take appropriate technical and organizational measures to protect your information. We train our employees who handle personal information to respect the confidentiality of customer information and the privacy of individuals. We regard breaches of your privacy very seriously and will impose appropriate penalties, including dismissal where necessary.

### HOW DO WE STORE PERSONAL INFORMATION AND FOR HOW LONG?

Safeguarding the privacy of your information is important to us, whether you interact with us personally, by phone, by mail, over the internet or any other electronic medium. We hold personal information in a combination of secure computer storage facilities and paper-based files and other records, and take steps to protect the personal information we hold from misuse, loss, unauthorized access, modification or disclosure.

When we consider that personal information is no longer needed, 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 to comply with state or federal law or internal policies.

Where 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.

### TRANSFERS OUTSIDE OF THE UNITED STATES

In instances where we may transfer your personal information outside of the United States in connection with any of the purposes discussed herein, similar security measures will be in place to safeguard your personal information, to the same or higher standards as in the United States.

### THE PERSONAL INFORMATION WE HOLD ABOUT YOU

For further information about any rights that might be available to you in relation to the personal information we hold about you, please refer to our website.

#### COOKIES

- **What is a cookie and how do we use cookies?**

A cookie is a small piece of text stored on your computer or device when you visit a website or an app.

We use cookies on our websites or our apps to provide you with a more relevant and effective experience, including presenting web pages according to your needs or preferences. We also use various tracking tools, such as Google Analytics, Google Ad Manager, Google Search Console, Adobe Analytics, and Adobe Audience Manager, among others from time to time, to collect and analyze information about how the DailyFX website is used. For further information about cookies, how we use cookies, and how to adjust your cookie settings, please refer to the Cookie Policy on our website.

- **Technology Improvements**

We are constantly striving to improve functionality on this site through technology changes. This may mean a change to the way in which personal information is collected or used. The impact of any technology changes which may affect your privacy will be notified in this privacy notice at the time of the change.

- **Links to third-party websites**

Our websites or our apps may have links to external third party websites. Please note, however, that third party websites are not covered by this privacy notice and those sites are not subject to our privacy standards and procedures. Please check with each third party as to their privacy practices and procedures.

### HOW DO WE PROTECT YOUR PERSONAL INFORMATION?

We have made a significant investment in leading-edge security software systems and procedures to offer you a safe and secure environment and protect your personal information. While no security system is absolutely impenetrable, we are constantly reviewing, refining, and upgrading our security technology as new tools become available.

We also use technology to encrypt information transmitted by or to you through our website. In order to maximize the benefits of this technology, we recommend that you utilize a browser with strong encryption capabilities.

The privacy protection provided to you on the DailyFX website does not extend to any other website. Once you access another website, you are subject to the policies of that website.

#### NOTICE OF FINANCIAL INCENTIVE

DailyFX may, from time to time, offer you certain promotions, rewards, and incentive programs ("Promotions") that may be considered financial incentives programs under the CCPA. Eligible clients may receive a bonus or other benefit for fulfilling the requirements of Promotions, the details of which will be provided at the time you sign up for the Promotions, or otherwise enter the Promotions, if you are eligible. Participation in our Promotions is voluntary, and requires your prior opt-in consent, which may include accessing the DailyFX website, mobile app, Promotion entry page, and affiliate website(s) via a designated link specific to a particular Promotion. If you elect to participate, you may do so by performing certain voluntary interactions with us, our website, or an affiliate website(s) as detailed in the Promotions' Terms and Conditions. While we will not discriminate against you for exercising your rights under CCPA, if you request deletion of your data and have not met the Promotions requirements to be entitled to compensation, any accumulated rewards will be deleted and you may not have access to continued bonuses and benefits. You may terminate your relationship with DailyFX at any time.

DailyFX requires minimal personal information in order to provide the benefits of the Promotions to eligible participants, including the following categories of personal information: Identifiers, Customer Records Information, Commercial Information, and Identification Verification Documentation. DailyFX uses the

personal information of eligible participants to provide the benefits and to further our business in accordance with our Privacy Notice. The value DailyFX receives from our Promotions (and its incidental collection of consumer personal information) includes the profits generated by, and the consumer good will and consumer relationship established through, the offering of the DailyFX Promotions, and taking into account the costs to DailyFX to provide and maintain our Promotions.

If you elect to participate in a DailyFX Promotion, you may find out more about the specific terms of your participation by requesting this information from us at [compliance.us@ig.com](mailto:compliance.us@ig.com).

### CHANGES TO OUR PRIVACY NOTICE

If at any time in the future material changes are made to this privacy notice, we will notify you by email to the email address on record and/or through a notice on our website's home page. Your continued use of our website or application following the posting of changes constitutes your acceptance of such changes.

### EFFECTIVE DATE OF PRIVACY NOTICE

This privacy notice was amended as of April 5, 2021.

### HOW TO CONTACT US

If you have any questions about this privacy notice or want to exercise your rights, including the right to opt out of DailyFX disclosing your personal information, please contact us by:

- email [compliance.us@ig.com](mailto:compliance.us@ig.com); or
- writing to the address provided in the "Who are we?" section of this privacy notice.