

Privacy Policy

Services displayed on the website are provided by FXPesa (which is the registered trading name of EGM Securities Limited) and Card transactions are processed by Equiti Capital UK Limited.

FXPesa is the trading name of EGM Securities Limited (Company Registered No. PVT -AAAAFF7), which is authorised and regulated by the Capital Markets Authority, with its company registered address at 12th floor, Tower 2, Delta Corner Towers, Waiyaki Way, Westlands, Nairobi.

Equiti Capital UK Limited (Company No. 07216039) is authorised and regulated by the Financial Conduct Authority (firm reference no. 528328), with its company registered address at 69 Wilson Street, London, EC2A 2BB, UK.

FXPesa observes the requirements of the existing prevailing law on Privacy and Data protection and further guidelines on global Data Protection rules.

This policy (together with our terms of use and any other documents referred to on it) sets out the basis on which any personal data we collect from you, or that you provide to us, will be processed by us.

Please read the following carefully to understand our views and practices regarding your personal data.

By visiting www.fxpesa.com you are accepting and consenting to the practices described in this Policy.

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, should we deem it necessary.

For the purposes of this Law, we have nominated a data protection officer to ensure that the management of personal information complies with this Law and this Policy.

INFORMATION WE COLLECT FROM YOU

We will collect and process the following data about you from:

Information you give us:

- This is information about you that you give us by filling in forms on our website: www.egmsecurities.com (our site) or by corresponding with us by phone, e-mail or otherwise. It includes information you provide when you register to use our website, when you report a problem with our site or when you contact us to discuss any aspect of your account with us.
- The information you give us may include your name, address, date of birth, e-mail address and phone number, financial, tax and payment information, personal data and photograph ID or other information. We obtain most of this information directly from our customers through account applications or other submission forms, and from maintaining records of customer information provided in the course of our ongoing customer service. We may also obtain information from other sources to meet certain regulatory requirements.
- We may ask for other information voluntarily from time to time (for example, through market research, surveys or special financial promotion offers) to enable us to improve our service or consider the wider needs of our customers.

Information we collect about you:

- **Website:** when visiting our site, we will automatically collect the following information:
- technical information, including the Internet protocol (IP) address used to connect your computer to the Internet, your login information, browser type and version, time zone setting, browser plug-in types and versions, and operating system and platform.
- information about your visit, including the full Uniform Resource Locators (URL), clickstream to, through and from our site (including date and time), page response times, download errors, length of visits to certain pages, page interaction information (such as scrolling, clicks, and mouse-overs), methods used to browse away from the page, and any phone number used to call our customer service number.



- **Telephone Discussions:** In each of your discussions with members of our staff we may collect the following information about your call, i.e.: date and time, personal details, any changes registered after the opening of your account and any other significant information which we believe will assist in the efficient operation and maintenance of your account with us.

Information we receive from other sources:

We work closely with third parties (including, for example, business partners, sub-contractors in technical, payment and delivery services, advertising networks, analytics providers, search information providers, credit reference agencies). We use this information to, amongst other matters, assist us in AML/KYC matters.

COOKIES

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site. For detailed information please read our Cookies Policy.

TECHNOLOGY IMPROVEMENTS

We are always looking at ways to improve efficiency and functionality for customer experience on the website through technology enhancements. This may mean a change to the way in which we collect or use personal information. The impact of any technology changes, which may affect your privacy, will be notified to you at the time of any such change.

LINKS TO THIRD PARTY WEBSITES

Our site may have links to external third-party websites that may benefit the user. Please note, however, that third party websites are not covered by our privacy policy and these sites are not subject to our privacy standards and procedures.

HOW WE USE THE INFORMATION

We use information held about you in the following ways from Information you give to us:

- We will need to carry out our obligations arising from any contracts entered into between you and us and to provide you with the information, products and services that you request from us;
- to provide you with information about other products and services we offer that are similar to those that you have already agreed to or enquired about;
- to provide you, or permit selected third parties to provide you, with information about products or services we feel may be of interest to you. If you do not want us to use your data in this way, or to pass your details on to third parties for marketing purposes, please tick the relevant box situated on the form on which we collect your data or email us at compliance@fxpesa.com
- to ensure that content from our site is presented in the most effective manner for you and for your computer.

Information we collect about you we will use as follows:

- to administer our website and for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- to improve our website to ensure that content is presented in the most effective manner for you and for your computer;
- to allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to keep our website safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- to make suggestions and recommendations to you and other users of our site about products or services that may interest you or them.

Information we receive from other sources. We will combine this information with information you give to us and information we collect about you. We will use this information and the combined information for the purposes set out above (depending on the types of information we receive).

DISCLOSURE OF YOUR INFORMATION

Depending on the product or service concerned and particular restrictions on sensitive information, this means that personal information may be disclosed to:

- Other companies within the EGM Securities group of companies who provide financial and other services;
- Service providers and specialist advisers who have been contracted to provide us with administrative, financial, insurance or other services;
- Introducing brokers with whom, we have a mutual relationship
- Credit providers, courts, tribunals and regulatory and government tax authorities as agreed and authorised by law;
- Reference and credit reference agencies. This includes exchanging information with other companies and organisations for the purposes of money laundering regulations, financial crime, fraud protection and mitigation of credit risk;
- Anyone authorised by the individual, as specified by that individual or by law through a Power of Attorney Agreement.

You agree that We have the right to share your personal information with:

- advertisers and advertising networks that require the data to select and serve relevant adverts to you and others. We do not disclose information about identifiable individuals to our advertisers, but we will provide them with aggregate information about our users (for example, we may inform them that 500 men aged under 30 have clicked on their advertisement on any given day). We may also use such aggregate information to help advertisers reach the kind of audience they want to target. We may make use of the personal data we have collected from you to enable us to comply with our advertisers' wishes by displaying their advertisement to that target audience;
- analytics and search engine providers that assist us in the improvement and optimisation of our site;
- credit reference agencies for the purpose of assessing your credit score where this is a condition of us entering into a contract with you.

We will disclose your personal information to third parties:

- In the event that we sell or buy any business or assets, in which case we will disclose your personal data to the prospective seller or buyer of such business or assets.
- If FXPesa, or substantially, all of its assets are acquired by a third party, in which case personal data held by it about its customers will be one of the transferred assets.



— If we are under a duty to disclose or share your personal data in order to comply with any legal obligation, or in order to enforce or apply our terms of use or other agreements; or to protect the rights, property, or safety of FXPesa, our customers, or others. This includes exchanging information with other companies and organisations for the purposes of fraud protection and credit risk reduction.

WHERE WE STORE YOUR PERSONAL DATA

We hold personal information in a combination of secure cloud storage facilities, held electronically on off-site back-up servers or held within multiple cloud servers and we take all necessary steps to protect the personal information we hold from misuse, loss, unauthorised access, modification or disclosure.

The data that we collect from you may be transferred to, and stored at, a destination selected by us. By submitting your personal data, you agree to this transfer, storing or processing. We will take all steps reasonably necessary to ensure that your data is treated securely and in accordance with this privacy policy.

All information you provide to us is stored on our secure servers. Any payment transactions will be encrypted using SSL technology. Where we have given you (or where you have chosen) a password which enables you to access certain parts of our website, you are responsible for keeping this password confidential. We ask you not to share a password with anyone.

Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your personal data, we cannot guarantee the security of your data transmitted to our site; any transmission is at your own risk. Once we have received your information, we will use strict procedures and security features to try to prevent unauthorised access.

YOUR RIGHTS

You have the right to ask us not to process your personal data for marketing purposes. We will usually inform you (before collecting your data) if we intend to use your data for such purposes or if we intend to disclose your information to any third party for such purposes. You can exercise your right to prevent such processing by checking certain boxes on the forms we use to collect your data. You can also exercise the right at any time by contacting us by

Email: compliance@fxpesa.com

EGM Securities Limited | Equiti Capital UK Limited | Equiti Group Limited



ACCESS TO INFORMATION

The Law gives you the right to access information held about you. Your right of access can be exercised in accordance with the Law. If you would like a copy of the information we hold about you, please write to us verifying your identity and specifying what information you require at the address set out for notices and correspondence in clause 1.1 of our Client Agreement.

CHANGES TO OUR PRIVACY POLICY

Any changes we make to our privacy policy in the future will be posted on this page and, where appropriate, notified to you by e-mail. Please check back frequently to see any updates or changes to our privacy policy.

CONTACT FOR COMPLAINTS

If you consider that any action of ours breaches this Privacy Policy Statement or otherwise doesn't respect your privacy, you can make a complaint. This will be acted upon promptly. To make a complaint, please contact the client services department or our Compliance Department at the following address.