

PRIVACY POLICY

Our Privacy Policy below describes in detail how Apex360 handles the collection, management and protection of all confidential user information.

INTRODUCTION

Your privacy is very important to us. We are committed to protecting and respecting your personal data. This Privacy Policy describes what types of personal data we collect about you when you choose to use our services, how we will use your personal data, when and with whom we share it and how we will keep it safe. It also details your rights in respect of our processing of your personal information and how you may exercise them. Please take the time to read and understand this policy.

We may make changes to this Notice from time to time and it is important that you check this Notice for any updates. Any personal information we hold will be governed by the current privacy notice at the given time. If we make changes we consider to be important, we will communicate them to you.

Please note that this notice is addressed to customers and potential customers. If you are an Apex360 employee, a contractor to Apex360 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.

This Privacy Policy (the Policy) explains the manner in which Apex360 (the Company, we) collects, uses, maintains and discloses user (the Client, you) information obtained through [http:// thewallstreetexchange.io](http://thewallstreetexchange.io) (the Website). The Company is bound by principles contained in the Data Protection Act 1998 and the EU e-Privacy Directive. By accessing our websites, including using any of the communication channels to contact us, we consider that you have read and understood the terms of this notice and how we process any information you disclose to us including personal data prior to becoming a client. Once you open an account with us you agree that this notice, including any amendments, will govern how we collect, store, use, share and in any other form process your personal data and your rights during our business relationship and after its termination.

By using this Website, you consent to the data practices prescribed in this Policy. The

Company may revise this Policy from time-to-time. If and when changes are made to this Privacy Policy, the changes will be posted to the Website and shall come into immediate effect unless otherwise stated. Any information held will be governed by the most current Policy.

WHAT INFORMATION DOES THE COMPANY COLLECT?

You supply us with your personal information through the account application process, which we are required to retain. We also maintain information as a result of your trading activity, website usage and cookie policy (see below). When you visit our website or use our services, we may also log your IP address, a unique identifier for your computer or other access device. For quality and control purposes we may monitor and record communications with you. Generally, this information is obtained when you agree to register as a customer and use our services. The cookie permission settings in your web browser implies consent to our cookie policy.

As part of our business, we collect personal data from customers and potential customers that include the following:

- Name, Surname and contact details
- Date of birth and gender
- Information about your income and wealth including details about your assets and liabilities, account balances, trading statements, tax and financial statements
- Profession and employment details
- Location data
- Knowledge and experience in trading, risk tolerance and risk profile
- IP address, device specifications and other information relating to your trading experience
- Bank account, e-wallets and credit card details
- Details of your visits to our website or our Apps including, but not limited to, traffic data, location data, weblogs and other communication data.

We use cookies to store and collect information about your use of our Website. Cookies are small text files stored by the browser on your equipment's hard drive. They send information stored on them back to our web server when you access our Website. These cookies enable us to put in place personal settings and load your personal preferences to improve your experience. You can find out more about our cookies on our Cookies Policy

available on our Website.

We also keep records of your trading behaviour, including a record of:

- Products you trade with us
- Historical data about the trades and investments you have made, including the amount invested
- Your preference for certain types of products and services

We are required by law to identify you if you are opening a new account or adding a new signatory to an existing account. Anti-money laundering laws require us to sight and record details of certain documents (i.e. photographic and non-photographic documents) to meet the standards, set under those laws. Identification documentation, as required under antimoney laundering legislation or other legislation relevant to the services we provide to you

includes:

- (a) passport;
- (b) drivers license;
- (c) national identity card (if applicable);
- (d) utility bills;
- (e) trust deed (if applicable);
- (f) a credit check on the individual; or
- (g) other information we consider necessary to our functions and activities.

If you are a corporate client we are required to collect additional information such as corporate documents of address, shareholders, directors, officers including additional personal information on the Shareholders and Directors. We have the right to ask any additional information we deem necessary to be compliant with our legal and regulatory requirements.

We obtain this information in a number of ways through your use of our services and websites, the account opening applications, our demo sign up forms, webinar sign up forms, website cookies and similar tracking technology built into our Websites and Apps, subscribing to news updates and from information provided in the course of our ongoing relationship.

We may also collect this information about you from third parties either through bought-in third party marketing lists, publicly available sources, social media platforms, introducing

brokers and affiliates, bankers and credit card processors, subscription-based intelligence databases and other third-party associates.

We may ask for other personal information voluntarily from time to time (for example, through market research, surveys or special offers). 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.

HOW DO WE USE IT?

We use information about you in the following ways:

We use your personal details and information obtained from other sources for the purpose of satisfying regulatory and legal requirements, for marketing, administration and customer services, to ensure that the content and services that we offer are tailored to your needs and interests. We keep your information for a reasonable period for these purposes. We may need to share your information with our service providers and agents. Generally, we require that third party organizations who handle or obtain personal information as service providers acknowledge its confidentiality and undertake to respect an individual's right to privacy and comply with Data Protection principles including this Policy.

We or agents acting on our behalf may:

- perform identity, money laundering and fraud prevention checks and may pass your details onto other group companies and other
- organizations (including law enforcement agencies) involved in fraud prevention and detection who may use your information in the same way;
- investigate your credit standing and in doing so may contact banks, financial institutions and credit reference agencies;

We may use the information you provide us to send you SMS or email communications for you to view, this includes, but is not limited to, margin calls or other information.

By providing us with your personal information you consent to our processing your

personal data for the above purposes.

USE AND MANAGEMENT OF COOKIES

Apex360 websites use cookies to provide the functionality you need to browse our site correctly. Apex360 websites issue cookies upon visiting our websites, unless the user has changed cookie settings in their browser to refuse cookies. Please note that with cookies switched off, many areas of our website and services will not be made available to you; such as Apex360, where login functionality will be unavailable.

Also, by disabling cookies, the functionality of social bookmarking will not be functional.

Apex360 does not use cookies to collect personal identifiable information about you. The cookies that we use collect solely anonymous information that is used to optimize our services.

Please note that not all the cookies on our sites are set by us. Please see the section below on third party cookies.

We may obtain information about you by accessing cookies (text files which are stored by your computer or other access device) when you visit our website or use our services.

Cookies store small pieces of information, such as names and email addresses. We are able to do this by using web beacons (also known as clear GIFS or web bugs). Web beacons do not store additional information on your computer but, by communicating with our cookies on your computer, they can remember things about our website which we use to improve your user experience. We use functionality cookies to analyze how visitors use our website and to monitor website performance and function. This allows us to provide a high quality customer experience by quickly identifying and fixing any issues that arise. For example, we might use performance cookies to keep track of which pages are most popular and which method of linking between website pages is most effective.

Functionality cookies are used by the Trading Platform to allow us to remember your preferences and identify you as a user, ensure your information is secure and to operate more reliably and efficiently. For example, cookies save you the trouble of typing in your username every time you access the Trading Platform, and recall your preferences, such as which language you wish to see when you log in.

You can delete cookies any time you want by using the settings in your web browser. You can also use your web browser to disable cookies, although this and other websites may not

function properly if you do this and you may not be able to sign in. Further information on deleting or controlling cookies is available at www.AboutCookies.org.

This website may use Google Analytics, a web analytics service provided by Google, Inc. (Google). Google Analytics uses analytical cookies placed on your computer, to help the website analyze a users use of the site. The information generated by the cookie about your use of the website (including your IP address) may be transmitted to and stored by Google on their servers. Google may use this information for evaluating your use of the website, compiling reports on website activity and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Googles behalf. Google will not associate your IP address with any other data held. By using this website, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

APEX360 WEBSITE COOKIE TYPES

- Session cookies save website session credentials for visitors both logged in and not logged in. Once the browser is closed, the cookie is deactivated and the session closed.
- Analytical cookies collect visitor information, such as the number of visits and how our website was found (e.g. via a marketing campaign). This information is extremely important to us as it helps us improve our website and further enhance visitor experience.
- Functional cookies are solely concerned with visitor experience on the website. For instance, they recognize the open/closed status of pop up messages, they memorize the time zone or view state of the Economic Calendar and they enable access to information stored when registered with Apex360. Without these functional cookies no settings information can be saved.
- Third Party cookies are set by other websites who place cookies on the users computer and are introduced when you are logged in to their service. These cookies are session, analytical and functional and Apex360 does not control their dissemination. These cookies determine if the user is already logged into a social network, control bookmarking or sharing Apex360 content and determine when the user is viewing Apex360 videos if you have Flash player installed; Wall Street Exchange uses Adobe Flash Player to display this content. Flash cookies (Local Shared

Objects) are used to verify whether the users browser supports Flash. If you wish to disable Flash cookies, please visit www.adobe.com/products/flashplayer/security. Other third parties should be contacted directly to view their cookie privacy information.

For further reading on cookies and their use please visit:

<https://ico.org.uk/global/cookies/>

HOW DO WE PROTECT YOUR INFORMATION? WHEN

AND HOW TO CONTACT US

If your personal details change, if you have any queries about how we use your information, or wish to help us improve this Policy, please notify us by contacting us at:

support@apex360.io