



UNA Forex Limited Privacy Statement

This Privacy Statement outlines how we handle information that can be used to directly or indirectly identify an individual (“Personal Data”).

A. General Information

When does this Privacy Statement apply?

This Privacy Statement applies to Personal Data that you provide to UNA Forex Limited (as defined below) or which is derived from the Personal Data as outlined below.

What does UNA Forex Limited do with my Personal Data?

UNA Forex Limited will process the Personal Data provided hereunder only as set out in this Privacy Statement. Further information can be found in Sections B. and C. below. Where the processing of your Personal Data is based on a statutory permission, you can find information on which Personal Data UNA Forex Limited is processing or using for which purposes in Section B below. Where the processing of your Personal Data is based on consent or necessity to enter into or perform a contract, you can find further information in Section C. below.

Duration of processing of Personal Data.

Where UNA Forex Limited is processing and using your Personal Data as permitted by law (see B. below) or to enter into or perform a contract or with your consent (see C. below), UNA Forex Limited will store your Personal Data

- only for as long as is required to fulfil the purposes set out below or
- until you object to UNA Forex Limited’s use of your Personal Data (where UNA Forex Limited has a legitimate interest in using your Personal Data), or
- until you withdraw your consent (where you consented to UNA Forex Limited using your Personal Data).

However, where UNA Forex Limited is required by mandatory law to retain your Personal Data longer or where your Personal Data is required for UNA Forex Limited to assert or defend against legal claims, UNA Forex Limited will retain your Personal Data until the end of the relevant retention period or until the claims in question have been settled.

Why am I required to provide Personal Data?

As a general principle, your granting of any consent and your provision of any Personal Data hereunder is entirely voluntary; there are generally no detrimental effects on you if you choose not to consent or to provide Personal Data. However, there are circumstances in which UNA Forex Limited cannot take action without certain Personal Data, for example because this Personal Data is required to provide you with access to an online platform or newsletter. In these cases, it will unfortunately not be possible for UNA Forex Limited to provide you with what you request without the relevant Personal Data.

Does the website automatically collect my information?

Log Files

Our web server software generates log files — text files that record one line of data each time a browser request is made. For example, a line of data elements (described in detail below) is added to the end of a log file each time a page is viewed or an element on the page is clicked. UNA Forex Limited uses its log files only to fix errors on the site and to defend against malicious attacks. If we detect an attack on our site, we will use log file data to try to determine the source of the attack. We may also share or report to law enforcement or other service providers (such as denial-of-service mitigation service providers) information about malicious attacks. All log files are automatically deleted after 7 days unless we believe that we need to retain them for longer in order to investigate or report a bug or malicious attack. UNA Forex Limited logs the following information from users who visit our site:

- **Internet Protocol (IP) address:** The address of your computer on the Internet. Your IP address gets transmitted whenever you communicate online or surf the Web so that the content you are looking at and the people you are talking to can find your computer on the network in order to respond to you.
- **The time and date the browser requested the URL of the page.**
- **URL of the page that directed (a “referrer”) you to our site:** If you arrive at our website through a link on another website (a blog, newspaper article, or search engine, for example) our web server will record the address of the web page that referred you to our site, if available. If you arrive at our website by clicking on a search result returned by a search engine, our server will record the search terms that you used when that information is available. However, for search engines that offer encryption (such as Google’s organic search results), we do not receive the search terms that you used.
- **The web pages within our site:** The specific web pages you visit within our site, including the first page you visit (the entry page) and the last page you visit (the exit page).
- **Amount of traffic used in the transaction:** The total number of bytes downloaded when you browse our site.
- **Analytics** UNA Forex Limited uses Google Analytics to learn about how people use our site. The data that the software collects about your visit on behalf of UNA Forex Limited and sends to Google’s servers is similar to the log file data described above:
 - Your device type, brand, and model
 - Your operating system
 - Your browser type, plugins, and version

- Pages you viewed on our site and time spent on each page
 - Referrer type and URL
 - Language of your browser
 - Country (determined by IP address) NOTE: We use Google Analytics with IP address masking activated; this means that Google only receives the first three octets of your IP address (e.g., 100.194.552.100 is logged as 100.194.552.0). This IP masking takes place as soon as data is received by Google's Analytics servers. At no time is the full IP address stored on Google's servers as the IP masking process happens in the volatile memory (a temporary data location) on Google's servers nearly instantaneously after the request has been received. Because your full IP address is never stored on Google's Analytics' servers when the anonymization flag is turned on – as it is with UNA Forex Limited's Google Analytics account – our analytics data will not include your full, individual IP address. Read more about IP Anonymization in Google Analytics.
- **Searches:** Our site search function is supported by WordPress, an open-source Content Management System. UNA Forex Limited records search terms used in searches of our website for analytics purposes. We do not log or correlate search term data with IP address or any other information about our visitors.
 - **Cookies:** Web cookies are small text files that are placed on your machine to help sites retain user preferences, store information for things like shopping carts, and provide anonymized tracking data to third-party applications like Google Analytics. As a rule, web cookies can make your browsing experience more seamless, but you may prefer to disable cookies on this site and on others. If you choose to disable cookies on our website, you should notice no difference in your browsing experience. The most effective way to do this is to disable cookies in your browser. We suggest consulting the Help section of your browser or taking a look at the About Cookies website which offers guidance for all modern browsers. UNA Forex Limited only uses cookies with our website analytics software, Google Analytics. While we run Google Analytics using the option for de-identification, it does require cookies to work properly.

Where will my Personal Data be processed?

As part of a global group of companies, UNA Forex Limited has affiliates and third-party service providers within as well as outside of the European Economic Area (the "EEA"). As a consequence, whenever UNA Forex Limited is using or otherwise processing your Personal Data for the purposes set out in this Privacy Statement, UNA Forex Limited may transfer your Personal Data to countries outside of the EEA including to such countries in which a statutory level of data protection applies that is not comparable to the level of data protection within the EEA. Whenever such transfer occurs, it is based on the Standard Contractual Clauses (according to EU Commission Decision 87/2010/EC or any future replacement) in order to contractually provide that your Personal Data is subject to a level of data protection that applies within the EEA. You may obtain a redacted copy (from which commercial information and

information that is not relevant has been removed) of such Standard Contractual Clauses by sending a request to privacy@unafx.com

Data subjects' rights.

You can request from UNA Forex Limited at any time information about which Personal Data UNA Forex Limited processes about you and the correction or deletion of such Personal Data. Please note, however, that UNA Forex Limited can delete your Personal Data only if there is no statutory obligation or prevailing right of UNA Forex Limited to retain it. Kindly note that if you request that UNA Forex Limited delete your Personal Data, you will not be able to continue to use any UNA Forex Limited service that requires UNA Forex Limited's use of your Personal Data.

If UNA Forex Limited uses your Personal Data based on your consent or to enter into or perform a contract with you, you may further request from UNA Forex Limited a copy of the Personal Data that you have provided to UNA Forex Limited. In this case, please contact the email address below and specify the information or processing activities to which your request relates, the format in which you would like this information, and whether the Personal Data is to be sent to you or another recipient. UNA Forex Limited will carefully consider your request and discuss with you how it can best fulfil it.

Furthermore, you can request UNA Forex Limited to restrict your Personal Data from any further processing in any of the following events: (i) you state that the Personal Data UNA Forex Limited has about you is incorrect, (but only for as long as UNA Forex Limited requires to check the accuracy of the relevant Personal Data), (ii) there is no legal basis for UNA Forex Limited processing your Personal Data and you demand that UNA Forex Limited restricts your Personal Data from further processing, (iii) UNA Forex Limited no longer requires your Personal Data but you claim that you require UNA Forex Limited to retain such data in order to claim or exercise legal rights or to defend against third party claims or (iv) in case you object to the processing of your Personal Data by UNA Forex Limited (based on UNA Forex Limited's legitimate interest as further set out in B. below) for as long as it is required to review as to whether UNA Forex Limited has a prevailing interest or legal obligation in processing your Personal Data.

Please direct any such request to privacy@unafx.com

Right to lodge a complaint.

If you believe that UNA Forex Limited is not processing your Personal Data in accordance with the requirements set out herein or applicable data protection laws (including, for EEA residents – EEA data protection laws), you can at any time lodge a complaint with the data protection authority of your country of residency, or for EEA residents – the EEA country in which you live or with the data protection authority of the United Kingdom.

Use of this website by children.

This website is not intended for anyone under the age of 16 years. If you are younger than 16, you may not register with or use this website.

Links to other websites.



This website may contain links to third party websites. UNA Forex Limited is not responsible for the privacy practices or the content of websites outside the UNA Forex Limited Group of companies. Therefore, we recommend that you carefully read the privacy statements of such third-party websites.

B. Where UNA Forex Limited Uses My Personal Data based on Law

In the following cases, UNA Forex Limited is permitted to process your Personal Data under the applicable data protection law.

Providing the requested goods or services.

If you order goods or services from UNA Forex Limited, UNA Forex Limited will use the Personal Data that you enter into the order or registration form, such as your name, email address, telephone number, company name and address, job title and role and, if payment is to be made to UNA Forex Limited, credit card number or bank details, in order to process your order or to provide the requested goods or service. This may include taking the necessary steps prior to entering into the contract, responding to your related inquiries, and providing you with shipping and billing information and to process or provide customer feedback and support. This may also include conversation data that you may trigger via the chat functionalities on UNA Forex Limited-labs.com or other local UNA Forex Limited web presences, contact forms, emails, or telephone. In this Privacy Statement, “goods and services” includes access to UNA Forex Limited’s web services, offerings, content, non-marketing related newsletters, whitepapers, tutorials, trainings and events.

Furthermore, we communicate on a regular basis by email with users who subscribe to our services, and we may also communicate by phone to resolve customer complaints or investigate suspicious transactions. We may use your email address to confirm your opening of an account, to send you notice of payments, to send you information about changes to our products and services, and to send notices and other disclosures as required by law. Generally, users cannot opt out of these communications, which are not marketing-related but rather required for the relevant business relationship with UNA Forex Limited. With regard to marketing-related types of communication, including emails, phone calls and text messages, UNA Forex Limited will (i) where legally required provide you with such information only after you have opted in and (ii) provide you the opportunity to opt out if you do not want to receive further marketing-related types of communication from us. You can opt out of these at any time.

Ensuring compliance.

UNA Forex Limited and its products, technologies, and services are subject to the laws of various countries. You acknowledge that pursuant to these laws, UNA Forex Limited is required to take measures to prevent entities, organisations, and parties listed on government-issued sanctioned-party lists from accessing certain products, technologies, and services through UNA Forex Limited’s websites or other delivery channels controlled by UNA Forex Limited. This may include:



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- automated checks of any user registration data as set out herein and other information a user provides about his or her identity against applicable sanctioned-party lists;
- (ii) regular repetition of such checks whenever a sanctioned-party list is updated or when a user updates his or her information;
- blocking of access to UNA Forex Limited's services and systems in case of a potential match; and
- contacting a user to confirm his or her identity in case of a potential match.

Furthermore, you acknowledge that any information required to track your choices regarding the processing or use of your Personal Data or receipt of marketing materials may be stored and exchanged between members of the UNA Forex Limited Group as required to ensure compliance.

UNA Forex Limited's legitimate interest.

Each of the use cases below constitutes a legitimate interest of UNA Forex Limited to process or use your Personal Data. If you do not agree with this approach, you may object against UNA Forex Limited's processing or use of your Personal Data as set out below.

Questionnaires and surveys. UNA Forex Limited may invite you to participate in questionnaires and surveys. These questionnaires and surveys will be generally designed in a way that they can be answered without any Personal Data. If you nonetheless enter Personal Data in a questionnaire or survey, UNA Forex Limited may use such Personal Data to improve its products and services.

Creation of anonymized data sets. UNA Forex Limited may anonymize Personal Data provided under this Privacy Statement to create anonymized data sets, which will then be used to improve its and its affiliates' products and services.

Recording of calls and chats for quality improvement purposes. In case of telephone calls or chat sessions, UNA Forex Limited may record such calls, after informing you accordingly during that call and before the recording starts, or chat sessions in order to improve the quality of UNA Forex Limited's services.

In order to keep you up to date/request feedback. Within an existing business relationship between you and UNA Forex Limited, UNA Forex Limited may inform you, where permitted in accordance with local laws, about its products or services that are similar or relate to such products and services you have already purchased or used from UNA Forex Limited. Furthermore, where you have attended a webinar or event of UNA Forex Limited or purchased products or services from UNA Forex Limited, UNA Forex Limited may contact you for feedback regarding the improvement of the relevant webinar, event, product or service.

Right to object. You may object to UNA Forex Limited using Personal Data for the above purposes at any time by unsubscribing. If you do so, UNA Forex Limited will cease using your Personal Data for the above purposes, under a legitimate interest set out above, and remove it from its systems unless UNA Forex Limited is permitted to use such Personal Data for another



purpose set out in this Privacy Statement or UNA Forex Limited determines and demonstrates a compelling legitimate interest to continue processing your Personal Data.

C. Where UNA Forex Limited uses My Personal Data based on Consent.

In the following cases UNA Forex Limited will only use your Personal Data as further detailed below after you have granted your prior consent into the relevant processing operations.

News about UNA Forex Limited's Products and Services.

Subject to a respective provision and your consent, UNA Forex Limited may use your name, email and postal address, telephone number, job title and basic information about your employer (name, address, and industry) as well as an interaction profile based on prior interactions with UNA Forex Limited (prior purchases, participation in webinars or events or the use of (web) services) in order to keep you up to date on the latest product announcements, software updates, software upgrades, special offers, and other information about UNA Forex Limited's software and services (including marketing-related newsletters) as well as events of UNA Forex Limited and in order to display relevant content on UNA Forex Limited's websites. In connection with these marketing-related activities, UNA Forex Limited may provide a hashed user ID to third party operated social networks or other web offerings, such as Twitter, LinkedIn, Facebook or Google, where this information is then matched against the social networks' data or the web offerings' own databases in order to display to you more relevant information.

Creating user profiles.

UNA Forex Limited offers you the option to use its web offerings including forums, blogs, and networks linked to this website that require you to register and create a user profile. User profiles provide the option to display personal information about you to other users, including but not limited to your name, photo, social media accounts, postal or email address, or both, telephone number, personal interests, skills, and basic information about your company.

These profiles may allow you to access other web offerings of UNA Forex Limited or of other entities of the UNA Forex Limited Group. It is, however, always your choice which of these additional web offerings you use and your Personal Data is only forwarded to them once you initially access them. Kindly note that without your consent for UNA Forex Limited to create such user profiles UNA Forex Limited will not be in a position to offer such services to you where your consent is a statutory requirement that UNA Forex Limited can provide these services to you.

Within any web offering, beyond the mere provision of access your profile is used to personalize interaction with other users and by UNA Forex Limited to foster the quality of communication and collaboration through such offerings. To the greatest extent supported by the relevant web offering, you can use the functionality of the relevant web offering to determine which information you want to share.

Forwarding your Personal Data to other UNA Forex Limited companies.

UNA Forex Limited may transfer your Personal Data to other entities in the UNA Forex Limited Group. The current list of UNA Forex Limited Group entities can be found here. In such cases,



these entities will then use the Personal Data for the same purposes and under the same conditions as outlined in this Section C. above.

Revocation of a consent granted hereunder. You may at any time withdraw a consent granted hereunder by unsubscribing. UNA Forex Limited will not process Personal Data subject to this consent any longer unless legally required to do so. In case UNA Forex Limited is required to retain your Personal Data for legal reasons your Personal Data will be restricted from further processing and only retained for the term required by law. However, any withdrawal has no effect on past processing of personal data by UNA Forex Limited up to the point in time of your withdrawal. Furthermore, if your use of a UNA Forex Limited offering requires your prior consent, UNA Forex Limited will no longer be able to provide the relevant service after your revocation.

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