

The top half of the page features an abstract background of overlapping, semi-transparent, geometric shapes in shades of gray and black, creating a sense of depth and movement.

Privacy Notice

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FNmarkets (Mauritius) Ltd

A large, faint watermark of the FNmarkets logo is visible in the bottom right corner of the page, consisting of the letters 'FN' and the word 'markets'.

Table of Contents

1. Introduction	2
2. Data Controller	2
3. Categories of Personal Data We Process	3
4. Special Categories of Personal Data	4
5. Sources of Personal Data	4
6. Purposes and Legal Bases for Processing	4
7. KYC, AML and Identity Verification	6
8. Trading Activity and Platform Monitoring	6
9. Automated Processing and Profiling	7
10. Disclosure of Personal Data	7
11. International Transfers	8
12. Data Retention	9
13. Security Measures	10
14. Your Rights	11
15. Cookies and Similar Technologies	12
16. Children's Data	12
17. External Links	12
18. Changes to this Notice	12
EU/EEA/UK ADDENDUM	13
1. Lawful Bases	13
2. Special Categories of Data	13
3. International Transfers	13
4. Complaints	13

1. Introduction

This Privacy Notice (the “Notice”) explains how FNmarkets (Mauritius) Ltd., an Investment Dealer (Full-Service Dealer, excluding Underwriting), regulated by the Financial Services Commission (‘FSC’) in Mauritius, trading as FNmarkets (“FNmarkets”, “we”, “us” or “our”), collects, uses, stores, discloses, transfers and otherwise processes Personal Data relating to individuals who access or use our website, trading platform, client portal, products and related services (together, the “Services”).

FNmarkets is committed to processing Personal Data lawfully, fairly and transparently, and to implementing appropriate safeguards to protect such data.

This Notice applies to Personal Data processed in connection with the Services, including where you:

- A. visit our website;
- B. create or use an account;
- C. interact with our trading platform or client portal;
- D. complete verification or compliance procedures;
- E. make deposits or withdrawals;
- F. contact us for support or other enquiries; or
- G. otherwise interact with us in a commercial, contractual or regulatory context.

Where required by applicable law, jurisdiction-specific provisions may supplement this Notice.

2. Data Controller

For the purposes of applicable data protection law, Mauritius Data Protection Act 2017, including, where applicable, the EU General Data Protection Regulation (Regulation (EU) 2016/679) and the UK GDPR, the data controller is:

FNmarkets (Mauritius) Ltd.

Registered Office: Rue de la Democratie, Office 306, 3rd Floor, Ebene Junction Ebene, Mauritius

Email: compliance@fnmarkets.com

Website: www.fnmarkets.com

Where FNmarkets engages affiliates, service providers or third parties to process Personal Data on its behalf, such parties shall act under appropriate contractual and legal safeguards.

3. Categories of Personal Data We Process

We may collect and process the following categories of Personal Data, depending on the nature of your relationship with us and the Services you use:

- 3.1. Identity and Verification Data. This may include your full name, date of birth, nationality, residential status, gender, photograph, government-issued identification details, passport details, national ID details, tax identification details, and other data required for identity verification, KYC or AML purposes.
- 3.2. Contact Data. This may include your email address, telephone number, residential address, postal address and other contact details.
- 3.3. Account and Profile Data. This may include account credentials, usernames, passwords, authentication details, account preferences, account settings, support history, and records relating to account creation and maintenance.
- 3.4. Financial and Payment Data. This may include bank account details, payment card details, wallet details, payment history, deposit and withdrawal records, billing details, and other financial data relevant to your transactions with us.
- 3.5. Compliance and Due Diligence Data. This may include source-of-funds information, source-of-wealth information, sanctions screening results, politically exposed person status, adverse media results, fraud screening results, and records collected for legal, regulatory or financial crime compliance purposes.
- 3.6. Trading and Transaction Data. This may include order history, transaction records, open and closed positions, account balances, trading performance data, trading behaviour patterns, account metrics, platform activity, and other records relating to your use of the Services.
- 3.7. Technical and Device Data. This may include IP address, browser type and version, operating system, device identifiers, device fingerprints, session logs, timestamps, geolocation indicators, network data, cookies and similar technologies, and other technical information generated by your use of the Services.
- 3.8. Communications Data. This may include emails, chat logs, support tickets, call recordings, complaints, enquiries, account notes, and other communications between you and FNmarkets.
- 3.9. Marketing and Preferences Data. This may include your preferences regarding marketing communications, your consent records, and your interaction with promotional communications or website campaigns.

4. Special Categories of Personal Data

We do not intentionally process special categories of Personal Data unless such processing is strictly necessary and lawful.

Where identity verification, fraud prevention or compliance procedures involve biometric verification or similar sensitive data, such processing will be carried out only where permitted by applicable law and subject to appropriate safeguards. Where required, we will rely on your explicit consent or another lawful basis available under applicable law.

5. Sources of Personal Data

We may collect Personal Data from the following sources:

- 5.1. Directly from You. We collect Personal Data directly from you when you complete forms, create an account, upload documents, use the Services, make payments, contact us, or otherwise communicate with us.
- 5.2. Automatically Through Your Use of the Services. We collect certain technical, device, usage and activity data automatically when you access our website, platform or client portal.
- 5.3. From Third Parties. We may receive Personal Data from third-party service providers, including identity verification providers, payment processors, analytics providers, sanctions screening providers, fraud prevention providers, business partners, affiliates, advisers and public sources.
- 5.4. From Publicly Available Sources. We may collect Personal Data from public registers, sanctions lists, company registries, adverse media sources and other publicly available databases where necessary for compliance, due diligence or legal purposes.

6. Purposes and Legal Bases for Processing

We process Personal Data for the following purposes and, where applicable, on the following legal bases:

- 6.1. Account Opening and Administration. We process Personal Data to create, verify, administer and maintain accounts, provide access to the Services, authenticate users, and manage account settings. Legal basis: performance of a contract; legitimate interests.
- 6.2. Provision of the Services. We process Personal Data to operate the website, trading platform, client portal and related services, to process transactions, and

to provide customer support.
Legal basis: performance of a contract; legitimate interests.

- 6.3. KYC, AML, Sanctions and Compliance. We process Personal Data to conduct know-your-customer, anti-money laundering, sanctions, fraud prevention, source-of-funds, source-of-wealth and other compliance checks.
Legal basis: legal obligation; legitimate interests.
- 6.4. Fraud Prevention and Security. We process Personal Data to protect the integrity of the Services, monitor suspicious activity, detect fraud, prevent payment abuse, protect accounts, investigate incidents, and enforce our legal rights.
Legal basis: legal obligation; legitimate interests.
- 6.5. Trading Oversight and Market Integrity. We process Personal Data relating to trading activity and account behaviour in order to monitor risk, maintain market integrity, detect abusive or prohibited trading behaviour, investigate irregularities, and protect the operational security of the Services.
Legal basis: performance of a contract; legitimate interests; legal obligation where applicable.
- 6.6. Payments, Withdrawals and Financial Administration. We process Personal Data to receive deposits, process withdrawals, verify payment methods, prevent chargebacks and payment abuse, maintain accounting records, and manage financial operations.
Legal basis: performance of a contract; legal obligation; legitimate interests.
- 6.7. Communications and Support. We process Personal Data to respond to enquiries, provide support, handle complaints, communicate with you in relation to your account or the Services, and maintain service records.
Legal basis: performance of a contract; legal obligation; legitimate interests.
- 6.8. Legal and Regulatory Obligations. We process Personal Data to comply with applicable laws, regulations, court orders, lawful requests, audit requirements and regulatory obligations.
Legal basis: legal obligation.
- 6.9. Legal Claims and Dispute Management. We process Personal Data where necessary to establish, exercise or defend legal claims, to respond to disputes, chargebacks, complaints or investigations, and to protect our legal position.
Legal basis: legitimate interests; legal obligation; establishment, exercise or defence of legal claims.
- 6.10. Marketing. Where permitted by applicable law, we may process Personal Data to send service-related communications, updates, legal notices or marketing communications.

Legal basis: legitimate interests or consent, depending on the nature of the communication and the applicable jurisdiction.

7. KYC, AML and Identity Verification

FNmarkets may process Personal Data for identity verification, anti-money laundering, counter-terrorist financing, sanctions compliance, anti-fraud and related compliance purposes.

Such processing may include:

- A. review of identity documents;
- B. facial comparison or liveness detection, where used by verification providers;
- C. source-of-funds and source-of-wealth checks;
- D. politically exposed person screening;
- E. sanctions and watchlist screening;
- F. transaction monitoring;
- G. fraud detection and prevention;
- H. enhanced due diligence.

FNmarkets may use specialised third-party verification and compliance providers for these purposes, subject to contractual safeguards and applicable law.

8. Trading Activity and Platform Monitoring

As part of providing the Services, FNmarkets may collect and process information relating to your trading activity and use of the Platform, including:

- A. order and transaction history;
- B. account balances and position data;
- C. account performance metrics;
- D. trading behaviour patterns;
- E. device, access and activity logs;
- F. linked account indicators;
- G. suspicious or prohibited activity signals.

We process such data to:

- A. administer and operate the Services;
- B. detect and investigate abusive or prohibited trading practices;
- C. protect market integrity;
- D. manage operational and commercial risk;

- E. investigate suspicious activity;
- F. enforce our Terms and Conditions and related policies.

9. Automated Processing and Profiling

FNmarkets may use automated systems, scoring tools, behavioural monitoring and profiling techniques for fraud detection, payment risk assessment, account security, suspicious activity identification, market abuse detection and compliance purposes.

Where such processing produces legal effects or similarly significant effects in circumstances governed by applicable data protection law, FNmarkets will implement appropriate safeguards, which may include review procedures and, where applicable, the opportunity to request human intervention.

10. Disclosure of Personal Data

FNmarkets may disclose Personal Data to third parties where such disclosure is necessary for the provision of the Services, compliance with legal or regulatory obligations, the protection of FNmarkets' legitimate interests, the prevention of fraud or financial crime, the administration of client relationships, or the establishment, exercise or defence of legal claims.

- 10.1. Affiliates and Group Entities. FNmarkets may disclose Personal Data to its affiliates, related entities and intra-group service functions where necessary for operational support, compliance, risk management, fraud prevention, customer support, technology services, legal review, internal reporting or the administration of the Services.
- 10.2. Service Providers and Processors. FNmarkets may disclose Personal Data to third-party service providers and data processors engaged to support the operation of the Services, including providers of:
 - A. website hosting, cloud infrastructure and data storage;
 - B. trading platform technology and related technical services;
 - C. payment processing, banking support and transaction verification;
 - D. identity verification, liveness detection, KYC, AML, sanctions screening and fraud prevention services;
 - E. customer support, communications and ticketing systems;
 - F. cybersecurity, monitoring, logging and access-control services;
 - G. analytics, performance monitoring and service optimisation tools; and
 - H. professional and administrative support services.

FNmarkets requires such providers to process Personal Data only on documented instructions, subject to appropriate confidentiality, security and data protection obligations.

- 10.3. Financial Institutions, Payment Partners and Verification Chains. FNmarkets may disclose Personal Data to banks, payment service providers, card processors, e-wallet providers, transaction screening providers, fraud prevention partners and other payment-chain participants where necessary to process deposits, withdrawals, refunds, payment disputes, chargeback responses, source-of-funds reviews, transaction verification or payment-related risk management.
- 10.4. Compliance, Regulatory and Law Enforcement Disclosures. FNmarkets may disclose Personal Data to regulators, supervisory bodies, law enforcement authorities, tax authorities, financial intelligence units, courts, tribunals, governmental bodies or other competent authorities where such disclosure is required or permitted by applicable law, regulation, court order, lawful request, audit requirement, regulatory inquiry or compliance obligation.
- 10.5. Legal and Professional Advisers. FNmarkets may disclose Personal Data to its legal advisers, auditors, accountants, consultants, insurers, investigators and other professional advisers where reasonably necessary for legal advice, regulatory compliance, audit, dispute resolution, debt recovery, enforcement action, risk assessment, insurance matters or the protection of FNmarkets' rights and interests.
- 10.6. Corporate Transactions and Business Reorganisation. FNmarkets may disclose Personal Data in connection with any proposed or actual merger, acquisition, financing, restructuring, reorganisation, sale of assets, transfer of business, insolvency process or other corporate transaction, provided that appropriate safeguards are implemented where required by applicable law.
- 10.7. Protection of Rights, Security and Market Integrity. FNmarkets may disclose Personal Data where reasonably necessary to detect, investigate or prevent fraud, financial crime, payment abuse, prohibited trading practices, security incidents, account misuse, technical abuse, unlawful conduct or breaches of contractual terms, and may share relevant information with appropriate counterparties, service providers, financial institutions, fraud prevention partners or authorities for those purposes, where lawful.

11. International Transfers

Due to the international nature of our operations and service provider relationships, Personal Data may be transferred to and processed in jurisdictions outside your country of residence, including jurisdictions which may not provide the same level of data protection as your home jurisdiction.

Where required by applicable law, FNmarkets will implement appropriate safeguards for such transfers, including:

- A. Standard Contractual Clauses approved by the European Commission;
- B. the UK International Data Transfer Agreement or relevant addendum;
- C. transfers to jurisdictions recognised as providing an adequate level of data protection;
- D. other lawful transfer mechanisms recognised under applicable law.

12. Data Retention

FNmarkets retains Personal Data only for as long as necessary for the purposes for which it was collected and processed, including for contractual, legal, regulatory, accounting, tax, compliance, fraud-prevention, risk-management, audit, dispute-resolution and recordkeeping purposes.

Retention periods may vary depending on the nature of the Personal Data, the purpose for which it is processed, the Services involved, and the legal or regulatory obligations applicable to FNmarkets. In determining the appropriate retention period, FNmarkets may take into account, without limitation:

- A. the duration of the client relationship and the continued provision of the Services;
- B. applicable legal, regulatory, tax, accounting and recordkeeping requirements;
- C. anti-money laundering, sanctions, fraud-prevention and financial crime compliance obligations;
- D. the need to maintain records relating to trading activity, payments, withdrawals, refunds, chargebacks, complaints, investigations and enforcement actions;
- E. the need to establish, exercise or defend legal claims, respond to disputes, or protect FNmarkets' legal and commercial interests;
- F. the sensitivity, nature and volume of the Personal Data concerned; and
- G. whether retention remains necessary for audit, security, business continuity or evidential purposes.

In particular, FNmarkets may retain certain categories of Personal Data for longer periods where such retention is required or justified in connection with identity verification records, transaction and trading records, payment records, compliance files, fraud-prevention records, complaint files, internal investigation materials, communications records or legal proceedings.

Without prejudice to the above, FNmarkets retains records relating to customer identification, transactions, and due diligence for a minimum period of seven (7) years following the termination of the business relationship or the completion of a transaction, in accordance with applicable anti-money laundering and regulatory requirements.

Where Personal Data is no longer required, FNmarkets will delete, anonymise or securely dispose of such data in accordance with applicable law and internal retention procedures. Where deletion is not immediately possible, FNmarkets may restrict the processing of the relevant data and retain it only for as long as necessary for lawful and legitimate purposes.

13. Security Measures

FNmarkets implements appropriate technical and organisational measures designed to protect Personal Data against accidental or unlawful destruction, loss, alteration, unauthorised disclosure, unauthorised access, misuse or other unlawful forms of processing.

Such measures are designed having regard to the nature, scope, context and purposes of the processing, as well as the likelihood and severity of the risks to individuals' rights and freedoms.

Depending on the nature of the data and the relevant processing activities, such measures may include:

- A. role-based access controls and access segregation based on business need;
- B. authentication controls, credential management procedures and, where appropriate, multi-factor authentication;
- C. encryption in transit and, where appropriate, at rest;
- D. system monitoring, logging, alerting and access traceability measures;
- E. network, application and infrastructure security controls;
- F. measures designed to detect, contain and respond to security incidents, suspicious activity and unauthorised access attempts;
- G. internal confidentiality obligations and staff training on data protection and information security;
- H. vendor and service provider due diligence measures, where relevant to the processing of Personal Data; and
- I. business continuity, backup and recovery measures, where appropriate.

Access to Personal Data is limited to personnel, contractors, service providers and authorised recipients who require such access for legitimate business, operational, compliance, legal, support or security purposes and who are subject to appropriate confidentiality and security obligations.

Although FNmarkets takes reasonable steps to protect Personal Data, no method of transmission, storage or processing can be guaranteed to be completely secure. You are responsible for maintaining the confidentiality of your account credentials and for taking reasonable steps to protect your devices, passwords, authentication methods and account access.

- 13.1. Personal Data Breaches and Security Incidents. In the event of a personal data breach, security incident or other unauthorised access to, loss, destruction, alteration or disclosure of Personal Data, FNmarkets shall take such steps as it considers appropriate to identify, contain, assess, investigate and remediate the incident, in accordance with its internal procedures, applicable law and regulatory requirements.

Where required by applicable law, FNmarkets shall notify the competent supervisory authority and, where applicable, affected individuals, within the timeframes and in the manner prescribed by such law.

FNmarkets may take such additional measures as it reasonably considers necessary to mitigate the effects of the incident, prevent recurrence, protect its systems and Services, preserve relevant evidence, and safeguard its legal and operational interests.

14. Your Rights

Depending on your jurisdiction and applicable law, you may have the following rights in relation to your Personal Data:

- A. the right of access;
- B. the right to rectification;
- C. the right to erasure;
- D. the right to restriction of processing;
- E. the right to data portability;
- F. the right to object to processing;
- G. the right to withdraw consent where processing is based on consent;
- H. the right to lodge a complaint with a competent supervisory authority.

FNmarkets may request additional information to verify your identity before acting on a request.

These rights are not absolute and may be subject to legal or regulatory limitations.

15. Cookies and Similar Technologies

FNmarkets may use cookies, pixels, tags, SDKs and similar technologies to operate the website and Services, improve functionality, analyse usage, protect security and, where permitted, support marketing or advertising activities.

Some cookies are strictly necessary for the operation of the website and Services. Others may be used only with your consent where required by applicable law.

Further information may be set out in our Cookie Notice or cookie management interface.

16. Children's Data

The Services are intended only for individuals who are at least 18 years old, or the legal age required under applicable law, whichever is higher.

FNmarkets does not knowingly offer the Services to minors and does not knowingly collect Personal Data from minors.

If we become aware that Personal Data has been collected from a minor in breach of applicable law or policy, we may take appropriate steps to delete such data and restrict access to the Services.

17. External Links

Our website or Services may contain links to third-party websites, applications or services. FNmarkets is not responsible for the privacy practices, content or policies of third parties. You should review the privacy notices of any third-party service you access.

18. Changes to this Notice

FNmarkets may amend, update or replace this Notice from time to time to reflect changes in our processing practices, legal requirements, business operations or the Services.

Any updated version will be made available through the website or other appropriate channels. Where required by applicable law, we will take reasonable steps to notify you of material changes.

Contact Details

If you have any questions, concerns or requests regarding this Notice or the processing of your Personal Data, you may contact us at:

Email: compliance@fnmarkets.com

Address: Rue de la Democratie, Office 306, 3rd Floor, Ebene Junction Ebene, Mauritius

EU/EEA/UK ADDENDUM

This Addendum applies to individuals in the European Economic Area and the United Kingdom, to the extent the GDPR or UK GDPR applies to the processing of their Personal Data.

1. Lawful Bases

Where the GDPR or UK GDPR applies, FNmarkets processes Personal Data on one or more of the following lawful bases:

- A. performance of a contract;
- B. compliance with a legal obligation;
- C. legitimate interests;
- D. consent, where required;
- E. establishment, exercise or defence of legal claims;
- F. any other lawful basis recognised by applicable law.

2. Special Categories of Data

Where FNmarkets processes special categories of personal data, it will do so only where a condition under Article 9 GDPR or the UK GDPR equivalent applies, including explicit consent where required, or where processing is necessary for compliance with legal obligations or the establishment, exercise or defence of legal claims.

3. International Transfers

Where Personal Data is transferred outside the EEA or the UK, FNmarkets will apply an appropriate transfer mechanism in accordance with Chapter V GDPR and the UK GDPR framework, as applicable.

4. Complaints

If you are located in the EEA or the UK, you may have the right to lodge a complaint with the data protection authority in your country or with another competent supervisory authority.