

Axi Global Privacy Notice

We prioritise your privacy and the security of your personal information. We understand the trust you place in us when sharing your information and are committed to protecting it in accordance with the highest standards of privacy law globally.

This Privacy Notice applies to all Axi Group companies across the jurisdictions in which we operate, including: AxiCorp Financial Services Pty Limited (Australia, Dubai International Finance Centre/United Arab Emirates, and New Zealand), Solaris EMEA Limited (Cyprus); Solaris Markets Limited (Vanuatu); AxiCorp Pte Ltd (Singapore); AxiTrader Limited (Saint Vincent & Grenadines); and Axi Financial Services (UK) Limited (United Kingdom).

Your Consent

By engaging with our services, using our websites or platforms, by applying to work with us, or by providing us with your personal information directly or indirectly, you consent to the collection, use, and disclosure of your personal information as outlined in this Privacy Notice. This consent is granted when you submit information through our application forms, during communications with us, or by using our digital services (including when you apply to open an account or apply to work with us). Your continued use of our services signifies your acceptance of this Privacy Notice and to any updates to it.

Purpose of Data Collection

Axi collects personal information to provide you with our products and services, or to employ you.

Category	Description
Assessment and Account Management	To evaluate your applications, manage your account, and deliver the services you have requested.
Compliance and Regulatory	To meet our regulatory and legal obligations, including identity verification and anti-money laundering checks.
Service Enhancement	To improve our offerings, customer service, and develop new products that meet customer and market needs.
Communication	To keep you informed about relevant opportunities, updates, and offerings from Axi.
Direct Marketing	To offer you products and services that we believe may interest you. Axi will not provide your information to non-Axi Group entities for marketing purposes. If you don't want to be contacted for marketing purposes, click on the unsubscribe link at the bottom of our marketing emails or contact at marketing@axi.com.

Types of Personal Information Collected

The personal information we collect depends on the products and services we offer and how you deal with us, or if you have applied to work with us.

Personal Information	What this includes
Identity, demographic and contact details	Name, date of birth, mailing and residential address, telephone numbers, and email address.
	 Age, gender, country of birth, citizenship or residency status, relationship status and family circumstances, education, whether you have children, dependents, or are a carer.
Government related	Concession, Passport, Visa, Driver Licence, Tax File Number
identifiers and identity documents	 Copies of other government identification numbers or documents such as birth and marriage certificates.
Employment information	If you are a client, employment status, salary, role, and
	 If you work for us, or apply to work for us, the above information, plus additional information including workers employment history, workplace performance, workplace injuries, accidents, and misconduct.
Health or medical	Medical records such as diagnoses, diagnostic imaging reports, handwritten medical
information (If you apply to work with us, or if you experience hardship, or have a vulnerability)	reports, pathology reports, psychological assessments, vaccination history, drug and alcohol test results, and specialist's letters.
Financial and credit-related	Your bank account and credit card details.
information	Personal insolvency information
	 Consumer credit information, which includes details about consumer loans, credit cards and overdrafts, and your repayment history, default and credit infringement information.



Property and asset-related information	Information about property or assets. To verify your source of wealth and funds.
Business information	Directors Identification NumberDetails of the shareholdings.
Photographs, video or audio recordings, and transcripts	 Photographs, video, and audio recordings when you participate in certain marketing initiatives Call audio recordings and transcripts when we speak to you and instant message with you.
Data analytics	 Your interactions with us, including your queries or complaints, opt-ins to receive marketing surveys and communications, as well as information collected at the point of application and trading. Metrics for suspicious and potentially fraudulent transactions, trades, market manipulation, or unacceptable trading circumstances.
Website and app tracking	When you visit our websites or use one of our apps, we collect information through cookies and other technologies. This may include details of visits, pages viewed, user location, and server address/IP address.
Interaction and behavioural information	Your interactions with us, including your queries or complaints, opt-ins to receive marketing surveys and communications, as well as information collected at the point of application, trading, and transacting with us.
Vulnerability	Information that may indicate vulnerability, such as age, disability, mental health conditions, physical health conditions, family violence, language barriers, literacy barriers, cultural background, or financial distress.

How we collect your personal information

We collect your personal information from:

- You, including:
 - o from your interactions with us, including in person, over the phone, via email, website, and mail
 - o from embedded tools on our websites such as cookies and pixels
- Third parties, including from your dealings with our related entities, introducing brokers, affiliates, and our service providers,
- Publicly available sources of information such as social media websites and government websites and registers.

We also create information about you when we analyse personal or other information we already hold about you.

Legal Bases for Processing

Axi processes your personal information under several legal bases to provide our products and services across our global operations, and in compliance with our global obligations.

Reason for Processing	Description and Examples
Business administration	We perform a variety of business administration functions which involve handling personal
	information such as:
	Billing and financial auditing
	Estimating balance sheet reserves
	Processing financial transactions.
Business decisions and	We use data analytics tools across multiple settings for generating business
improvements	information to help us make decisions related to our business including trades you
	place and those we place.
	We may use your personal information to identify opportunities to improve our
	business, products, and services.
Complaints, disputes, and	Where matters are to be resolved through the court system, at a tribunal, or external
litigation	dispute resolution service.
Consent, including	Where you have explicitly agreed to our processing of your personal information for specific
marketing	purposes, such as marketing communications.
Data matching	We use data matching techniques to verify the accuracy or improve the quality of
	information we hold about you. We also use data matching to improve upon or deliver our
	products and services to you.
Legal and regulatory	We must comply with regulatory obligations which require us to handle personal
obligations	information. For example, certain criminal matters identified by our investigations team
	may be referred to the police.



	When processing is necessary for compliance with a legal obligation to which we are
	subject, including financial regulations, anti-money laundering laws, tax laws,
	employment, and labour laws, and engaging in litigation and dispute resolution.
Legitimate Interests	We may process your information for our legitimate business interests, such as to improve
	our services, protect against fraud, and enhance our customer service, except where such
	interests are overridden by your interests or fundamental rights and freedoms.
Managing fraud and	We have systems in place to prevent, detect and investigate any actual or suspected
financial crime	fraudulent or criminal activity or other serious misconduct.
	If we investigate, we may:
	collect additional personal information from public sources of information, such as
	social media, to gather evidence.
	Verify, including with external parties, whether document or information you is
	accurate.
Providing our products and	Actioning your requests
services	Administering your trades and accounts, and
	Answering your questions or providing financial services advice
	Assessing your application to trade with us (including eligibility)
	Performing our contractual obligations
	 Providing and managing products, services, and programs to our business, corporate,
	and institutional customers and the use of the products and services by their
	customers.
	Responding to complaints and enquiries
	Supporting customers experiencing vulnerability
	 Verifying information you provide to us (including data matching).
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Data Sharing

Your personal information may be shared within the Axi group and with external third parties under controlled and secure conditions.

Group	Description
Axi Group	Across our global offices for account management, operational support, and service provision.
Regulatory and Legal	With regulators, law enforcement, and other governmental authorities as required by law.
Compliance	
Service Providers	With third-party service providers who support our business operations, such as IT support, marketing, and customer service.
Business Partners	As necessary to provide you with services requested or where you have chosen to use an introducing broker, money manager, affiliate/introducer, or other third party.

Sharing overseas

The Axi Group operates globally through its owned and controlled entities and utilising service providers (including cloud service providers and data centres). You consent to your personal information being shared with recipients in locations around the world including Australia, China, Cyprus, India, Malaysia, New Zealand, Philippines, Singapore, The United Kingdom, and Vanuatu.

A recipient of your personal information overseas may be required to disclose it under a foreign law. This disclosure is not a breach your rights or applicable privacy law.

If you do not provide us with your personal information

You do not have to provide us, our agents, introducing brokers, affiliates, or service providers, with your personal information when seeking our products or services or interacting with us. However, if you don't provide us the information we require, we may not be able to provide you the products or services you request, or employ you.

Protection Measures

We are committed to protecting your personal information.

Security Measure	What we do
Security Technologies	Use of encryption, firewalls, and secure server facilities to safeguard your information
	during transmission and storage.



Access Controls	Limiting access to your information to employees, authorised service providers, and third parties who need it to provide our products and services to you.
Training and Awareness	Regular training for our staff on data protection and privacy to ensure they understand the importance of protecting personal information.

Rights of Individuals

You have rights concerning your personal information.

Right	Description
Access	You can request access to the personal information we hold about you.
Correction	Request correction of inaccurate personal information.
Erasure	Ask for your personal information to be deleted in certain circumstances.
Restriction	Request the restriction of processing of your personal information.
Portability	Obtain and reuse your personal data for your own purposes across different services.
Object	Object to processing based on legitimate interests or direct marketing.
Withdraw Consent	Where processing is based on consent, you have the right to withdraw that consent at any
	time.

To exercise any of these rights, please contact us using the contact details provided in this policy. We will respond to your requests in accordance with applicable legal requirements. If you exercise these rights, you also acknowledge we may not be able to continue to provide our products and services to you, or employ you.

Cookies and Tracking Technologies

Axi utilises cookies and similar tracking technologies on our websites and applications to enhance user experience and gather analytical data. These technologies help us understand how our services are used, improve website functionality, and tailor our communications and services to better meet your needs.

Cookie Type	Description
Essential Cookies	Necessary for the operation of our websites, enabling basic functions like page navigation and access to secure areas.
Performance Cookies	Collect information about how visitors use our websites, helping us improve user experience and optimize our services.
Functional Cookies	Enable our websites to remember choices you make (such as your username or the region you are in) and provide enhanced, more personal features.
Targeting/Advertising	Used to deliver advertisements more relevant to you and your interests, as well as to limit
Cookies	the number of times you see an ad and help measure the effectiveness of the advertising campaign.

You can accept or decline cookies. Most web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. Please note that disabling cookies may limit your use of certain features or functions on our websites and services.

Changes to This Policy

Axi may update or modify this Privacy Notice at any time to reflect changes in our practices, technology, legal requirements, or other factors. We will post the revised policy on our website with an updated effective date and take appropriate measures to inform you, consistent with the significance of the changes we make.

We encourage you to review this policy periodically to stay informed about how Axi is protecting your information. Your continued use of our services following the posting of changes to these terms will mean you accept those changes.

Contact Us

For questions about this Privacy Notice, or to make a complaint about the way we handle your personal information, contact us:

Privacy Officer
Axi Group
privacy@axi.com



For specific inquiries related to your region:

• EU Residents: info@eurorep.eu

• UK Residents: compliance.uk@axi.com

Australia and New Zealand Residents: <u>privacy@axi.com</u>

• UAE/DIFC Clients, Waystone Compliance Solutions, Katherine Brookstein kbrookstein@waystone.com

If you are not satisfied with our response, you may have the right to contact the relevant data protection authority in your jurisdiction:

For EU Residents - EU Data Protection Authorities

Contact details can be found at the European Data Protection Board website.

• For UK Residents - UK Information Commissioner's Office

Visit ico.org.uk or call 0303 123 1113.

For Australian Residents - Office of the Australian Information Commissioner

Visit oaic.gov.au or call 1300 363 992.

For New Zealand Residents - New Zealand Privacy Commissioner

Visit privacy.org.nz or call 0800 803 909.

• For UAE/DIFC Clients - DIFC Data Privacy Officer

Email commissioner@dp.difc.ae or call +971 4 362 2222

For residents of the United Arab Emirates, Axi complies with the Data Protection Law No.5 of 2020. We have appointed a data protection officer (DPO) to oversee compliance with this privacy notice. If you have questions or concerns about this notice, you are encouraged to contact our DPO. You have the right to make a complaint at any time to the relevant authority that safeguards your interests, including the DIFC Data Privacy Officer.