

## PRIVACY POLICY OF X-TRADE BROKERS DOM MAKLESKI S.A.

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### General provisions

The objective of the present Privacy Policy ("Policy") is to provide a detailed description of the methods applied by X-Trade Brokers Dom Maklerski S.A. with the registered office in Warsaw at ul. Ogrodowa 58 and/or its branches and subsidiaries (hereinafter: "XTB", "we", "us") to collect and use information provided by Users of this website ("Portal"), including – where applicable – personal data. Please read this Policy carefully.

### Protection of personal data and other data of portal users

XTB pays particular attention to respecting privacy of persons using our website and any applications available through the website (hereinafter: "portal", "website"). Any personal data obtained through our portal are processed in compliance with applicable national regulations issued on the ground of Directive of the European Parliament and of the Council of 24 October 1995 on the protection of individuals with regard to the processing of personal data and on the free movement of such data № 95/46/EC (Official Journal of the EU L 28, 23/11/1995, P. 0031-0050). Our priority is to ensure protection of the rights and freedoms of individuals who provide us with their personal data. Use of the portal in the basic scope does not require provision of the user's personal data to XTB. Provision of the personal data by the user is completely voluntary; however, provision of certain data is required for performance of the services by XTB.

We understand the importance of maintaining confidentiality with regard to personal data. While providing us with his or her data, the user may be certain that we will do our best to keep it secret. We have undertaken measurable steps to ensure that users' data remain confidential, secure and intact.

If the user decides to open a demo account or a real account, XTB will require provision of certain information. The information may include first name and surname, address, date of birth, contact information, data for execution of payments, as well as other necessary information. Periodically, we may also require provision of other information in order to improve the services performed. Most information is obtained directly from you by means of application forms or other forms, as well as by maintaining registers of information provided to us during ongoing performance of services in favour of our customers. We may also collect information on how the user uses the website, e.g. pages visited by the user, frequency and duration of the user's stay at the website and transaction related activities.

Data obtained from users will only be used to provide the information and services which the user may request us to provide, and to improve the quality of our services. Unless the user is notified otherwise, personal data kept by us will be used in connection with opening and maintaining the user's account, performance of ongoing reviews of the user's needs, improvement of customer service and products as well as for notifying users of available opportunities which, in our opinion, may turn out important to them.

Access to users' data is only granted to those employees or partners who require that information to provide support related to execution of users' instructions connected with our products or services. We have implemented procedures connected with securing and using personal data.

Although XTB undertakes all necessary efforts to ensure security of data provided to us, the user acknowledges that using the Internet is not completely safe and, therefore, we cannot always guarantee security or inviolability of personal data provided to us by the user(s) over the Internet.

The user may at any time notify XTB that his or her data changed or request XTB to delete the user's personal data by sending an e-mail message to [dealing@xtb.pl](mailto:dealing@xtb.pl). In compliance with the user's instruction, we will amend or delete the personal data from our database, however, excluding the scope in which we are obliged to maintain the data on the ground of regulations or laws to provide the requested services to the user, or to maintain respective business registers.

Pursuant to valid laws on the protection of personal data, the user is entitled to receive copies of all his or her personal data and to inform us of all observed inaccuracies. However, certain exceptions to this rule are foreseen. In order to submit a request regarding access to the data, the user ought to contact us, verify his or her identity and specify the information in question.

We may be contacted at the following e-mail address: [dealing@xtb.pl](mailto:dealing@xtb.pl)

### Use of cookies - COOKIES FILES

XTB uses cookies files to gather information.

Cookies files are small data files, in particular, text files, which are stored in the terminal equipment (hard disc) of the Portal User and are destined for the use of Portal websites. Cookies files usually contain the name of the website, which they originate from, the duration of their storage in the terminal equipment as well as the unique number.

XTB uses cookies files for the following purposes:

1. to provide the User with more precise and comfortable use of the Site, tailoring the content of the XTB internet websites to the User's preferences as well as to optimise the use of the Portal. In particular, such files enable to detect the equipment of the User of the Internet Service and properly display the internet website adjusted to the User's individual needs;

2. to examine the activity of the Portal's User in order to create statistics, which help us to understand in what way the Portal's Users use the internet websites, which contributes to the improvement of the structure and content of those sites as well as identification of the source, which the User has used to enter the Site;
3. to maintain the session of the Portal's User (after logging-in).

The cookies are often used by many sites in Internet. The User may elect whether and in what way the cookie will be accepted through the change of preferences and options in his/her browser. If the User decides to shut down the cookies support in his/her browser, the access to some parts of the Site may be impossible.

XTB uses two main kinds of cookies files:

1. persistent cookies are stored in the User's terminal equipment for the period of time defined in the parameters of the cookies files, or by the time they are deleted by the User;
2. session cookies – stored in the User's terminal equipment by the time of logging-out.

In many cases the software which is used for viewing the internet websites implicitly allows the storage of cookies files in the User's terminal equipment. The Users of the Site may, at any time, change the settings regarding cookies files. Such settings may be changed, in particular, in such a way, so as to block the automatic processing of cookies files in the settings of the internet browser, or inform each time about their placing in the User's equipment. The detailed information about the possibility and ways of processing cookies files, including, the disabling, blocking and deleting cookies files, is available in the settings of the software for a concrete internet website.

Information on disabling the handling of the cookies files for the most popular internet websites:

1. For internet browser Internet Explorer 9:
  - a. click "Tools" and then "Options" in the browser window;
  - b. then click the "Privacy" tab and move the slider to the highest position to block all cookies files, or to the lowest position to accept all cookies files;
  - c. then click "ok".
2. For internet browser Internet Mozilla Firefox:
  - a. at the top of the Firefox browser window, press the button Firefox (in XP Windows click Menu Tools) and choose "Options";
  - b. choose "Privacy" panel;
  - c. choose from the dropped down menu "Firefox Programme" option "will use settings of the user's history";
  - d. uncheck the function "Accept cookies";
  - e. press key "ok".
3. For internet browser Internet Google Chrome:
  - a. choose "Settings";
  - b. click "Show Advanced Settings";
  - c. in section "Privacy", click "Content Settings";
  - d. in section "Cookies files", click "All cookie files and site data" to open the dialogue window "Cookie files and other data";
  - e. choose "Block the attempts to enter the site data into the computer".

XTB announces that the limitations in the use of cookies files may have an impact on the operations of some functionalities available on the Portal's sites.

Not making changes of the settings of the internet browser for the settings blocking the writing of the cookies files is equivocal with the granting of consent for their writing.

You may find more information on cookies at the address: [www.aboutcookies.org](http://www.aboutcookies.org), or in section Help in the internet browser menu.

This Policy refers to the use of the cookies only through this Portal and is not applicable to their use by any third party.

If a User opens an account with us, he, or she will have to use our software which makes possible for us to use cookies with regard to the User's access to this Portal.

### Mobile Applications Privacy Policy

This chapter describes the privacy policy of XTB mobile applications.

The mobile device stores an enciphered unique Application Identifier (the parameter is generated in the process of Application registration on the XTB side) – it is stored on the device until the deletion of the mobile application from the device.

The Application Identifier referred to above and information about the brand, type and hardware token of the mobile device is transferred to XTB in the registration process of the device in the Application and it is used for explicit identification of the Application and the mobile device.

The communication between the mobile application and XTB system is held with the use of advanced deciphering mechanisms.

Depending on a mobile platform, XTB applications may gain access to the following functions on the mobile device:

- a. Internet connection;
- b. Device camera to take pictures of documents and/or user's face during real account registration;
- c. Photo gallery on the device to send pictures of documents and/or user's face during real account registration;
- d. Access to user's space to save a picture;
- e. Advertising Identifier (IDFA) to monitor efficiency of our own advertising campaigns and installation of our application;
- f. Chat microphone;
- g. Phone mode in order to switch on the sleep mode of the application when it is in the background.

Depending on the mobile application, application functions may be cancelled by changing system settings on the device or uninstalling the application.

Mobile applications do not store any personal data which could allow a third party to identify a particular application user. Anonymous data concerning users' activity on Mobile Applications may be processed by XTB for statistical purposes.

Additionally, XTB informs that the applications have two connected services:

1. Google Firebase – to collect statistical data of application performance and information about the way customers use the application, such data is fully anonymous, and
2. Fabric.io – to collect statistical data of application performance and information about the way customers use the application, such data is fully anonymous, additionally, this service allows XTB to collect crash, i.e. applications' errors which are also fully anonymous and deprived of any data which may enable to identify the customer or their information.

If you do not consent to this privacy policy, please do not install the Application, or uninstall it.

#### **Links to other websites**

Links to websites of other entities are available at our website. The links are provided for the user's convenience, but we do not review, control or monitor privacy practices applied at third parties' websites. Our Policy does not relate to websites maintained by third parties. We are not liable for the activities of websites maintained by third parties or transactions performed with such persons.


#### **Final provisions**

XTB reserves the right to amend this Policy. Amendments are performed by publication of the new Policy at the website. Amendments become effective at the time of implementation. Users are encouraged to acquaint themselves periodically with the text of this Policy in order to track amendments to its provisions.

Using this website means acceptance of this Policy. If the user does not accept it, XTB will not enable access to its services and use of the services must be stopped immediately.

Any disputes regarding this Policy, if not resolved amicably, will be resolved by the court of competent jurisdiction.

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