



PRIVACY POLICY

Orbex Limited is licensed by the "CYSEC" "license No.124/10"

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Orbex Limited is a regulated Cyprus Investment Firm, authorised by CySEC, licenced to provide Investment Services and Ancillary Services, based in Limassol, Cyprus (herein called 'the Company', 'we', 'us'). The Company is committed to protecting your privacy and developing technology that gives you the most powerful and safe online experience. This Privacy Policy applies to all Orbex Limited Websites and governs data collection and usage. It describes the information we collect from you, how we use and share that information and our legal basis for doing so. It also covers whether and how that information may be shared and your rights and choices regarding the information you provide to us. We use cookies and similar technologies, as described in our Cookie Policy. By using the Services offered by Orbex Limited, you're acknowledging you have agreed to our Terms of Use and that you have read and understood this Privacy Policy and our Cookie Policy.

By accessing, browsing and/or using this Website, you consent to the data practices described in this Policy and acknowledge that you have read, understood, and agree, to be bound by these terms conditions, and notices contained herein and to comply with all applicable laws and regulations.

Collection of your Personal Information

Orbex Limited collects and processes the following information depending on the services to be provided:

a) Personally Identifiable Information:

- Information you provide when completing a Real/Demo Account Registration (online or hard copy) — your name, email and postal addresses, telephone number, country of residence, employment status, financial background, login, and password details. We may ask for this information if you register as a user of the Services, subscribe to our newsletters, upload or submit content through Orbex Website, or if you contact us;
- Information you provide for identity and residence verification purposes, including your legal name, business name and Tax ID for business entities, and date of birth. Furthermore, you will be requested to provide a secure upload of an identity document (such as your passport, driver's license or other government-issued ID) and of a proof of residence (bank statement, utility bill, other governmental analogous documentation);
- Details of any requests or transactions you make through the Services. The Company partners with other companies for payment processing, and the payment information you submit is collected and used by them in accordance with their privacy policies. Orbex Limited does not store your payment information apart from the first six and last four digits of your credit card or bank account (as applicable), expiration date, and country, which we require for tax, government regulatory, and security purposes;

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- Information required when subscribing for services such as to receive updates either via email or by posting on portions of the Site only accessible to registered users;
 - Information that you submit on or to Orbex Limited in the form of comments, contributions to discussions, or messages to other users and communications you send to us (for example, when you ask for support, send us questions or comments, or report a problem), information you post or make available in Forums will be publicly available;
 - If you desire to participate in a webinar, you will be asked to provide us with certain information necessary to conduct such a webinar. This information may include, among other things, your name and email address, certain generated content, such as feedback, data such as responses to in-video quizzes, standalone quizzes, tests, and surveys;
 - Information when you access or log-in to a third-party site, e.g., Facebook, from our Sites. This may include the text and/or images available from the third-party site;
 - Information when you provide information in response to a survey operated by us. This may include details about your race, your education history, trading history/experience, employment and other necessary information;
 - Information collected by Partner sites providing Online Course related tools and services to Orbex users. Such information may be nonfinancial individual level user data regarding the individual's use of that partner site while engaged with such Online Course related activities, and the partner sites may share that data with the Company for the purpose of improving the Company's services, the partner site's services, and the individual's education experience;
 - The Anti-Money Laundering Policy requires Orbex Limited to collect information and take the necessary action to prevent transformation and legalization (laundering) of money gained from illegal activity. In certain cases, Orbex Limited has the right to require a document disclosing the sources of money.
- b) Information relating to your use of our Site: This information is used by Orbex Limited for the operation of the service, to maintain quality of the service, and to provide general statistics regarding use of the Orbex Limited Website. Please keep in mind that if you directly disclose personally identifiable information or personally sensitive data through Orbex Limited public message boards, this information may be collected and used by others.
- When users come to our Site, we may track, collect and aggregate information indicating, among other things, which pages of our Site were visited, the order in which they were

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visited, when they were visited, and which hyperlinks were "clicked" in the form of traffic analytics;

- Information about your computer hardware and software that is automatically collected by Orbex Limited, information from the URLs from which you linked to our Site. This information can include: your IP address and the geographic location of his or her point of connectivity, operating system and browser type, domain names, access times and referring Website addresses;
- anonymous demographic information, which is not unique to you, such as your ZIP code, age, gender, preferences, interests and favorites;
- use (or may use) cookies and web beacons when you visit our Site. For more information on our use of cookies and web beacons, please refer to our Cookie Policy.

You are responsible for ensuring the accuracy of the Personally Identifiable Information you submit to Orbex Ltd. Inaccurate information may affect your ability to use the Site, the information you receive when using the Site, and our ability to contact you.

Orbex Limited does not read any of your private online communications.

Orbex Limited encourages you to review the privacy policies of Websites you choose to link to from Orbex Limited so that you can understand how those Websites collect, use and share your information. Orbex Limited is not responsible for the privacy policies or other content on Web sites outside of the Orbex Limited and Orbex Limited family of Websites.

Please understand that by submitting any Personally Identifiable Information to us, you consent and agree that we may collect, use and disclose such Personally Identifiable Information in accordance with this Privacy Policy and our Terms of Use, and as permitted or required by law. If you do not agree with these terms, please do not provide any Personally Identifiable Information to us. If you refuse or withdraw your consent, or if you choose not to provide us with any required Personally Identifiable Information, we may not be able to provide you with the services that can be offered on our Site. Consent can be withdrawn at any time by navigating to your profile page and clicking the box to remove consent or deleting your account. Please note that we may also rely on legitimate interests or fulfilment of a contract to continue processing your data.

Use of your Personal Information

Orbex Limited collects and uses your personal information to operate the Orbex Limited Website, to comply our contractual obligation to deliver the services you have requested, to keep your account

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secure, to improve, promote and protect its Services (including to verify the identities of creators and prevent fraud and abuse).

Orbex Limited also uses your personally identifiable information to create and administer your account, contact you, and customize your experience on Orbex, to inform you of other products or services available from Orbex Limited and its affiliates. In the instance, that you will be communicated by an affiliate for the purposes of direct marketing, prior to such communication being effected, you will be requested to give your free, explicit and specific consent to be expressed in a clear and conscious manner. Such consent will be requested to be given by you when you will be visiting the Internet Website of the said related companies and ticking the relevant box referring to the provision of direct marketing services.

We use Personally Identifiable Information collected when you sign-up for our various email or update services to send you the messages in connection with the Site or an Online Webinar (tracking attendance, progress, and completion of an Online Webinar). We may also archive this information and/or use it for future communications with you, where we are legally entitled to do so and we may share the Online Course information provided with the tutors or other individuals designated by the tutors to assist with the creation, modification or operation of the course.

You should not post any Personally Identifiable Information or other information of a personal or sensitive nature, whether relating to you or another person, within a Forum/Blog/Media Walls post. If you choose to do so, such Information may be collected during your use of the Forums/Blog/Media Walls and We may publish this information via extensions of our Platform that use third-party services, like mobile applications. We also reserve the right to reuse Forum/Blog/Media Walls posts that contain Personally Identifiable Information in future versions of the courses we offer, and to enhance future course offerings. We may archive this information and/or use it for future communications with you and/or your designee(s), and/or provide it to the University partner, business partner, or the instructor(s) associated with the courses you have taken. We may also use or publish posts submitted on the Forums/Blogs/Media Walls without using Personally Identification Information.

Orbex Limited may also contact you via surveys to conduct research about your opinion of current services or of potential new services that may be offered. Orbex Limited does not sell, rent or lease its customer lists to third parties.

Orbex Limited may, from time to time, contact you on behalf of external business partners about a particular offering that may be of interest to you. In those cases, your unique personally identifiable information (e-mail, name, address, telephone number) is not transferred to the third party. In addition, Orbex Limited may share data with trusted partners to help us perform statistical analysis, send you email or postal mail, provide customer support, or arrange for deliveries. All such third parties are prohibited from using your personal information except to provide these services to Orbex, and they are required to maintain the confidentiality of your information.

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In addition to the above, we may share your information with certain trusted third-party services to help us provide, improve, promote, or protect Orbex's Services (like Affiliates and IBs or when we partner with payment processors, or use services that help us manage our ads on other sites). When we share data with third-party services that support our delivery of the Orbex Services, we require that they use your information only for the purposes we've authorized, and that they protect your personal information at least to the same standards we do. We may also share information that's aggregated and anonymized in a way that it doesn't directly identify you.

Orbex Limited does not use or disclose sensitive personal information, such as race, religion, or political affiliations, without your explicit consent. Orbex Limited keeps track of the Websites and pages our customers visit within Orbex Limited, in order to determine what Orbex Limited services are the most popular. This data is used to deliver customized content and advertising within Orbex Limited to customers whose behavior indicates that they are interested in a particular subject area.

Orbex Limited Websites will disclose your personal information, without notice, only if required to do so by law and in response to court orders or other legal process or in the good faith belief that such action is necessary to: (a) conform to the edicts of the law or comply with legal process served on Orbex Limited or the site; (b) protect and defend the rights or property or safety of Orbex Limited, its employees, Site, users, customers or others; (c) defend against legal claims; (d) as otherwise required by law; (e) investigate, prevent, or take action regarding illegal or suspected illegal activities.

Orbex Limited is sometimes required by law to collect and use your data as for example for compliance with tax laws and other European and International reporting standards. In addition, we will collect, retain and use your personal information where and in the way necessary as required by our supervisory authority (CySEC) and where there is a legitimate interest to do so, when there is a good and fair reason in ways which do not hurt your interests and rights.

The Company's Site may include and/or provide links to other websites or services operated by other organisations other than Orbex Limited (Third Party Sites) that we believe might be of interest to you and whose privacy practices may differ from the Company's. We do not endorse and are not responsible for the privacy practices of these Third Party Sites. If you choose to click on a link to one of these Third Party Sites, you should review the privacy policy posted on the other site to understand how that Third Party Site collects and uses your Personally Identifiable Information.

Retention of Personally Identifiable Information

If you reside or are located in the EEA, we keep your Personally Identifiable Information for no longer than necessary for the purposes for which the Personally Identifiable Information is processed. The length of time we retain Personally Identifiable Information for depends on the purposes for which we collect and use it and/or as required to comply with applicable laws and to establish, exercise or defend

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our legal rights. We will retain your information as long as your account is active, as necessary to provide you with the Services or as otherwise set forth in this Policy and to the extent necessary to comply with our legal obligations, resolve disputes, enforce our agreements and protect the Company's legal rights. We also collect and maintain aggregated, anonymized or pseudonymized information which we may retain indefinitely to protect the safety and security of our Site, improve our Services or comply with legal obligations.

Your Rights

You have certain rights in relation to your Personally Identifiable Information. You can access your Personally Identifiable Information and confirm that it remains correct and up-to-date, request its deletion or choose whether or not you wish to receive material from us or some of our partners by logging into the Site and visiting your user account page.

If you reside or are located in the EEA, you have the right to request that we:

- provide access to any Personally Identifiable Information we hold about you;
- prevent the processing of your Personally Identifiable Information for direct-marketing purposes;
- update any Personally Identifiable Information which is out of date or incorrect;
- delete any Personally Identifiable Information which we are holding about you;
- restrict the way that we process your Personally Identifiable Information;
- provide your Personally Identifiable Information to a third party provider of services; or
- provide you with a copy of any Personally Identifiable Information which we hold about

We will offer you the opportunity to opt-out of your Personal Information (or to provide explicit consent for Sensitive Personal Information) being: (i) disclosed to a third party (other than a service provider as set forth below); or (ii) used for a purpose materially different from the purpose for which it was originally collected (as set out in our Privacy Policy), or subsequently authorized by you, when the circumstances arise. If you no longer wish to receive any promotional communications, you may opt-out of receiving them by following the instructions included in each communication.

For all the above you must inform us/communicate with us by emailing our Customer Support at support@Orbex.com or by contacting us by telephone, fax or postal mail at the contact information listed below.

Keep in mind, however, that there will be residual information that will remain within our databases, access logs and other records, which may or may not contain your Personally Identifiable Information.

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Please also note that certain Personally Identifiable Information may be exempt from such requests in certain circumstances, which may include if we need to keep processing your Personally Identifiable Information to comply with a legal obligation.

When you email us with a request, we may ask that you provide us with information necessary to confirm your identity.

Use of Cookies

The Orbex Limited Website consists of "cookies" to help you personalize your online experience. A cookie is a text file that is placed on your hard disk by a Web page server. Cookies cannot be used to run programs or deliver viruses to your computer. Cookies are uniquely assigned to you, and can only be read by a web server in the domain that issued the cookie to you. One of the primary purposes of cookies is to provide a convenience feature to save you time. The purpose of a cookie is to tell the Web server that you have returned to a specific page. For example, if you personalize Orbex Limited pages, or register with Orbex Limited site or services, a cookie helps Orbex Limited to recall your specific information on subsequent visits. This simplifies the process of recording your personal information, such as billing addresses, shipping addresses, and so on. When you return to the same Orbex Limited Website, the information you previously provided can be retrieved, so you can easily use the Orbex Limited features that you customized. You have the ability to accept or decline cookies. Most Web browsers automatically accept cookies, but you can usually modify your browser setting to decline cookies if you prefer. If you choose to decline cookies, you may not be able to fully experience the interactive features of the Orbex Limited services or Websites you visit.

Security of your Personal Information

The security of your personal information is important to us and this is why we maintain physical, electronic, and procedural safeguards to secure your personal information. Orbex Limited secures your personal information from unauthorized access, use or disclosure. However, no method of transmission over the internet or electronic storage is completely secure, so the Company cannot guarantee its absolute security. It is your responsibility to protect the security of your login information.

Orbex Limited secures the personally identifiable information you provide on computer servers in a controlled, secure environment, protected from unauthorized access, use or disclosure. When personal information (such as a credit card number) is transmitted to other Websites, it is protected through the use of encryption, such as the Secure Socket Layer (SSL) protocol.

Except as specifically set forth in this Privacy Statement, we do not share your personal information with any non-affiliated third party without your free, explicit and specific consent and in any event when your

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personal information is collected we will notify you of the recipient or the categories of recipients of such information. Furthermore, we will promptly notify you when the said data are to be first announced to a third party. We may disclose aggregate information, such as demographic information, and our statistical analyses to third parties, including advertisers or other business partners. This aggregate information does not include your personal information.

Agents

We use a card processing companies for your deposits and withdrawals to and from your account. These companies do not retain, share, store or use personally identifiable information for any other purposes.

International Privacy Practices

Orbex's Sites are primarily operated and managed on servers located and operated within Germany or other data centres countries. In order to provide our products and services to you, we may send and store your Personally Identifiable Information (also commonly referred to as personal data) outside of the country where you reside or are located. Accordingly, if you reside or are located outside of the Germany, your Personally Identifiable Information may be transferred outside of the country where you reside or are located, including to countries that may not or do not provide the same level of protection for your Personally Identifiable Information. We are committed to protecting the privacy and confidentiality of Personally Identifiable Information when it is transferred. If you reside or are located within the EEA and such transfers occur, we take appropriate steps to provide the same level of protection for the processing carried out in any such countries as you would have within the EEA to the extent feasible under applicable law. We participate in and commit to adhering to the EU-U.S. Privacy Shield Framework when transferring data from the EEA to the United States. Please see our Privacy Shield Policy for further information.

Changes to this Policy

Orbex Limited will occasionally update this Privacy Policy and practices to reflect the changes in data privacy law. The most recent version of the Privacy Policy will always be posted to the Company's website. Anytime that we do make such changes, we will also update the effective date listed at the bottom of the Privacy Policy. Any change, update, or modification will be effective immediately upon accessing, browsing and/or using the Company's Website. Orbex Limited encourages you to periodically review this Policy to be informed of how Orbex Limited is protecting your information, how you can manage the information you share with us and to ensure familiarity with the most current version of this Policy. We'll let you know about any material changes, either by notifying you on the Site or by sending you an email. New versions of this Policy will never apply retroactively — we'll tell you the exact date they go into effect.

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If you keep using our services after a change, that means you accept this Policy. This updated version of the Policy gives you more control over your information and explains how we use it.

Legal Disclaimer

We reserve the right to disclose your personally identifiable information as required by law and when we believe that disclosure is necessary to protect our rights and/or to comply with a judicial proceeding, court order, or legal process served on our Web site. We will not be liable for misuse or loss of personal information resulting from cookies on our website that we don't have access to or control over. We will not be liable for unlawful or unauthorized use of your personal information due to misuse or misplacement of your passwords, negligent or malicious, however contacted.

Contact Information

If you have any privacy-related questions, suggestions, unresolved problems, or complaints, please contact Orbex Limited through [contact us page](#), or [request a call back](#).

To contact our Data Protection Officer, please email compliance@orbex.com.

If you reside or are located in the EEA, you may also make a complaint to our supervisory body for data protection matters (namely the CY Office of the Commissioner for Personal Data Protection) or seek a remedy through local courts if you believe that your rights have been breached.

Protection of Children under 13

Orbex Limited strongly believes in protecting the privacy of children. In line with this belief, the Company does not knowingly collect or maintain any personal information from children under the age of 13 and children under 13 are not permitted to register for an account or use our Services. If you are under 13 years of age, then please do not use or access this Site at any time or in any manner. We will take appropriate steps to delete any Personally Identifiable Information of persons less than 13 years of age that has been collected without verified parental consent upon learning of the existence of such Personally Identifiable Information. If you believe that a child has provided us with personal information, please [contact us](#) at support@orbex.com.

Consent

I hereby provide my consent to the use of my personal data as indicated in this Privacy Policy.