



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 LLC (Saint Vincent & Grenadines); and Axi Financial Services (UK) Limited (United Kingdom). By this Privacy Notice, we set out to explain how Axi Group (collectively “Axi”, “we” or “us”) collects, uses and discloses your personal information as well as to provide information about your privacy rights. For all information processing operations described below, the Axi Group entity for whose services you are registered will operate as controller of your personal information. We also have contractual arrangements in place that enable us to safely share information between other Axi Group companies as explained below in order to enhance our service offerings and our supporting operations.

Your Consent

By engaging with our services, visiting or 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.

In certain jurisdictions we use consent occasionally for processing personal data and when we rely on consent, we will request you for your consent to allow us to process your personal information, and we will provide you with full details of the personal information that we would like and the reason we need it so that you can carefully consider whether you wish to consent

Where we rely on consent as the legal basis for processing personal information you have the right to withdraw it at any time by letting us know in writing via the contact channels set out herein.

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 | <ul style="list-style-type: none">Name, date of birth, mailing and residential address, telephone numbers, and email address. |



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| | <ul style="list-style-type: none"> 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 identifiers and identity documents | <ul style="list-style-type: none"> Concession, Passport, Visa, Driver Licence, Tax File Number. Copies of other government identification numbers or documents such as birth and marriage certificates. |
| Employment information | <ul style="list-style-type: none"> If you are a client, employment status, salary, role. 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, misconduct, religion, biometric data, and dependents data such as birth certificate, passport copy for insurance and visa processing. |
| Health or medical information <i>(If you apply to work with us, or if you experience hardship, or have a vulnerability)</i> | Medical records such as diagnoses, diagnostic imaging reports, handwritten medical reports, pathology reports, psychological assessments, vaccination history, drug and alcohol test results, and specialist's letters. |
| Financial and credit-related information | <ul style="list-style-type: none"> Your bank account and credit card details. 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 | <ul style="list-style-type: none"> Directors Identification Number. Details of the shareholdings. |
| Photographs, video or audio recordings, and transcripts | <ul style="list-style-type: none"> 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 | <ul style="list-style-type: none"> 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:
 - from your interactions with us, including in person, over the phone, via email, website, and mail
 - 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, and



- 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 for several purposes 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: <ul style="list-style-type: none">• Billing and financial auditing;• Estimating balance sheet reserves;• Processing financial transactions. |
| Business decisions and improvements | <ul style="list-style-type: none">• We use data analytics tools across multiple settings for generating business 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 litigation | Where matters are to be resolved through the court system, at a tribunal, or external dispute resolution service. |
| Consent, including marketing | Where you have explicitly agreed to our processing of your personal information for specific purposes, including 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 obligations | We must comply with regulatory obligations which require us to handle personal 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 financial crime | We have systems in place to prevent, detect and investigate any actual or suspected fraudulent or criminal activity or other serious misconduct. If we investigate, we may: <ul style="list-style-type: none">• 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 services | <ul style="list-style-type: none">• Actioning your requests.• Administering your trades and accounts.• 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).

Processing of special categories of personal information

Processing of personal information revealing racial or ethnic origin, religious or philosophical beliefs, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation shall be allowed where:

- you have given explicit consent to the processing of those personal data for one or more specified purposes, to the extent that local laws allow to;
- processing is necessary for our or your purposes of carrying out the obligations and exercising specific rights in the field of employment and social security and social protection;
- processing relates to personal information which are manifestly made public by you;
- processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity;
- processing is necessary for reasons of substantial public interest, on the basis of law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard your fundamental rights and the interests.

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 Compliance | With regulators, law enforcement, and other governmental authorities as required by law. |
| 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. |

Notwithstanding the above, data transfers or data sharing to jurisdictions considered as non-adequate are protected by safeguards such as standard contractual clauses or legal derogations. For further details of these safeguards you may contact the Privacy Officer.

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.

Retention

We will only retain your personal data for as long as necessary to fulfil the purposes we collected it for, including for the purposes of satisfying any legal, regulatory, compliance, accounting, or reporting requirements. To determine the appropriate retention period for personal data, we consider the amount, nature, and sensitivity of the personal data, the potential risk of harm from unauthorised use or disclosure of your personal data, the purposes for which we process your personal data and whether we can achieve those purposes through other means, and the applicable legal requirements.



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 and/or automated decision making or profiling. |
| 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. |



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| Targeting/Advertising Cookies | Used to deliver advertisements more relevant to you and your interests, as well as to limit the number of times you see an ad and help measure the effectiveness of the advertising campaign. |
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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.

Artificial Intelligence (AI) decision making

Axi may, in the future, use AI and automated decision-making tools to assist in processing client applications, risk assessments, or trading functions. If such tools are implemented, we will ensure compliance with all applicable privacy laws and provide transparency about their use.

If we introduce AI-driven decision-making, we will update this policy to consider how these technologies process personal information, the safeguards in place, and your rights, including the ability to request human review.

Before using AI tools to make significant decisions that may impact you, we will provide clear information about how these tools operate, including your right to challenge decisions.

Any AI decision-making system we implement will be subject to rigorous testing, audits, and compliance checks to prevent unfair outcomes, biases, or misuse of personal data.

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: compliance.eu@axi.com
- UK Residents: compliance.uk@axi.com
- Australia and New Zealand Residents: privacy@axi.com
- UAE Residents/DIFC Clients: privacy@axi.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](https://www.privacy.org.nz) or call 0800 803 909.

- **For UAE/DIFC Clients - DIFC Commissioner of Data Protection**

Visit <https://www.difc.com/contact-us> or DIFC Authority Level 14, The Gate Building, DIFC, Dubai, UAE 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 Commissioner of Data Protection.