

NobleFXM

Privacy Policy

Effective Date: [TO BE CONFIRMED]

Version: DRAFT v1

Classification: Confidential

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NobleFXM, Ltd
Saint Lucia International Business Company (IBC)
Registration No. 2026-00159
Ground Floor, The Sotheby Building, Rodney Bay, Gros-Islet, Saint Lucia

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1. INTRODUCTION

NobleFXM, Ltd ("the Company", "we", "us", or "our"), a Saint Lucia International Business Company (IBC) with registration number 2026-00159, registered at Ground Floor, The Sotheby Building, Rodney Bay, Gros-Islet, Saint Lucia, P.O. Box 838, Castries, Saint Lucia, is committed to protecting the privacy and personal data of its clients, website visitors, and other individuals with whom it interacts.

This Privacy Policy ("Policy") explains how the Company collects, uses, stores, shares, and protects personal data in connection with its trading services, website (www.noblefxm.com), and related platforms.

This Policy is designed to comply with applicable data protection laws, including the General Data Protection Regulation (EU) 2016/679 ("GDPR") for individuals in the European Economic Area (EEA), the UK General Data Protection Regulation ("UK GDPR") for individuals in the United Kingdom, and other applicable data protection legislation.

[COUNSEL TO REVIEW: Confirm whether the Company is required to appoint a Data Protection Officer (DPO) under GDPR Art. 37. Confirm whether a representative in the EU/EEA is required under GDPR Art. 27 for controllers not established in the EU.]

2. DATA CONTROLLER

The data controller for the purposes of applicable data protection law is:

NobleFXM, Ltd
Ground Floor, The Sotheby Building
Rodney Bay, Gros-Islet, Saint Lucia
P.O. Box 838, Castries, Saint Lucia
Email: compliance@noblefxm.com

3. CATEGORIES OF PERSONAL DATA COLLECTED

The Company may collect and process the following categories of personal data:

3.1 Identity Data

- Full legal name, date of birth, gender, nationality
- Government-issued identification documents (passport, national ID, driver's licence)
- Selfie or liveness verification images
- Photographs contained in identity documents

3.2 Contact Data

- Residential address, mailing address
- Email address, telephone number

3.3 Financial Data

- Bank account details, credit/debit card details, cryptocurrency wallet addresses
- Source of funds, source of wealth declarations
- Employment status, occupation, annual income range
- Investment experience and trading history

3.4 Trading Data

- Account balances, open and closed positions, order history
- Deposit and withdrawal records
- Profit and loss statements
- Platform usage and trading preferences

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3.5 Technical Data

- IP address, browser type and version, operating system
- Device identifiers and device fingerprinting data
- Login timestamps, session duration, pages visited
- Referral source and marketing attribution data

3.6 Communication Data

- Records of correspondence with the Company (emails, chat logs, phone call recordings)
- Support tickets and complaint records
- Survey responses and feedback

3.7 KYC Verification Data

- Results of identity verification checks (including third-party verification provider results)
- Sanctions screening results, PEP screening results, adverse media check results
- Risk assessment and due diligence records

4. HOW WE COLLECT PERSONAL DATA

We collect personal data through the following channels:

- Directly from you — when you open an account, complete KYC verification, submit forms, make deposits or withdrawals, or communicate with us
- Automatically — through cookies, web analytics, and similar technologies when you visit our website or use our platforms
- From third parties — including identity verification providers, sanctions screening services, payment processors, credit agencies, and public databases
- From publicly available sources — including government registries, media, and social media (for adverse media screening and due diligence)

5. LEGAL BASES FOR PROCESSING (GDPR ART. 6)

We process personal data on the following legal bases:

- Contract performance (Art. 6(1)(b)) — processing necessary for the performance of the Agreement to Open an Account and the provision of our trading services
- Legal obligation (Art. 6(1)(c)) — processing necessary to comply with legal and regulatory obligations, including AML/KYC requirements, sanctions screening, record-keeping, and tax reporting
- Legitimate interests (Art. 6(1)(f)) — processing necessary for the Company's legitimate interests, including fraud prevention, security, risk management, business analytics, and service improvement, provided such interests are not overridden by the data subject's rights and freedoms
- Consent (Art. 6(1)(a)) — where we rely on your consent, such as for marketing communications, non-essential cookies, and certain data sharing arrangements. You may withdraw consent at any time

[COUNSEL TO REVIEW: Verify that each processing activity has an appropriate legal basis documented. Confirm whether a Data Protection Impact Assessment (DPIA) is required for any high-risk processing activities (e.g., automated decision-making, profiling, large-scale processing of special category data).]

6. PURPOSES OF PROCESSING

We process personal data for the following purposes:

- Account opening, verification, and management
- Provision of trading services, including order execution, position management, and account funding
- KYC and AML compliance, including identity verification, sanctions screening, and ongoing monitoring

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- Fraud prevention and detection
- Risk management and credit assessment
- Processing deposits and withdrawals
- Customer support and complaint handling
- Marketing and promotional communications (with consent or where permitted by legitimate interest)
- Website and platform analytics, improvement, and personalisation
- Legal and regulatory compliance, including reporting to regulatory authorities and responding to legal process
- Internal record-keeping and audit
- Dispute resolution

7. DATA SHARING

We may share personal data with the following categories of recipients:

- Liquidity providers — to facilitate the execution of your trading orders (limited order and account data as necessary for execution)
- Payment processors and banking institutions — to process deposits and withdrawals
- KYC and identity verification providers — to verify your identity, screen against sanctions lists, and assess risk
- Platform technology providers — MetaTrader 5 (MetaQuotes) and TradeLocker, to provide trading platform functionality
- Cloud hosting and IT service providers — to store and process data securely
- Professional advisors — including legal, accounting, and audit firms
- Regulatory authorities, law enforcement, and courts — where required by law, regulation, or legal process
- Introducing Brokers and Partners — limited data (e.g., client attribution, trading volume for commission calculation) as necessary for the IB programme. IBs do not receive sensitive personal data
- Group companies — if the Company is part of a corporate group, data may be shared within the group for operational and compliance purposes

We do not sell personal data to third parties for marketing purposes.

[COUNSEL TO REVIEW: Confirm all data sharing arrangements and ensure appropriate Data Processing Agreements (DPAs) are in place with all processors.]

8. INTERNATIONAL DATA TRANSFERS

The Company is based in Saint Lucia. Personal data may be transferred to and processed in countries outside the European Economic Area (EEA) and the United Kingdom, including Saint Lucia and other jurisdictions where our service providers operate.

Where personal data of EEA or UK residents is transferred outside the EEA/UK, the Company ensures that appropriate safeguards are in place, including:

- Standard Contractual Clauses (SCCs) approved by the European Commission
- Adequacy decisions by the European Commission for the destination country
- Binding Corporate Rules (BCRs) where applicable
- Other legally recognised transfer mechanisms

[COUNSEL TO REVIEW: Confirm that appropriate transfer mechanisms are in place for all cross-border data transfers. Assess whether a Transfer Impact Assessment (TIA) is required for transfers to Saint Lucia or other non-adequate jurisdictions.]

9. DATA RETENTION

We retain personal data for as long as necessary to fulfil the purposes for which it was collected, including to satisfy

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legal, regulatory, accounting, and reporting requirements.

Typical retention periods:

- Account and trading data — for the duration of the client relationship plus a minimum of five (5) years after account closure (as required by AML regulations)
- KYC documentation — minimum five (5) years after account closure
- Financial transaction records — minimum five (5) years after account closure
- Marketing consent records — for the duration of the consent plus [SPECIFY: e.g., 2 years]
- Website analytics data — [SPECIFY: e.g., 26 months]
- Communication records — [SPECIFY: e.g., 5 years]
- Complaint and dispute records — minimum [SPECIFY: e.g., 5 years] after resolution

Data that is no longer required will be securely deleted or anonymised.

10. DATA SUBJECT RIGHTS

Under applicable data protection law (including GDPR), you have the following rights regarding your personal data:

- Right of access (Art. 15) — to obtain a copy of the personal data we hold about you
- Right to rectification (Art. 16) — to request correction of inaccurate or incomplete personal data
- Right to erasure (Art. 17) — to request deletion of your personal data, subject to legal retention requirements
- Right to restriction of processing (Art. 18) — to request that we limit the processing of your data in certain circumstances
- Right to data portability (Art. 20) — to receive your personal data in a structured, commonly used, machine-readable format
- Right to object (Art. 21) — to object to processing based on legitimate interests or for direct marketing purposes
- Right to withdraw consent — where processing is based on consent, you may withdraw consent at any time without affecting the lawfulness of prior processing
- Right not to be subject to automated decision-making (Art. 22) — to not be subject to a decision based solely on automated processing that produces legal or similarly significant effects

To exercise any of these rights, please contact us at compliance@noblefxm.com. We will respond to your request within one (1) month, or within three (3) months for complex or numerous requests, as permitted by GDPR.

You also have the right to lodge a complaint with a supervisory authority. For EEA residents, this is the data protection authority in your country of habitual residence, place of work, or place of the alleged infringement.

[COUNSEL TO REVIEW: Confirm the applicable supervisory authority. Assess whether the Company should designate a lead supervisory authority under GDPR Art. 56.]

11. COOKIES AND TRACKING TECHNOLOGIES

The Company uses cookies and similar tracking technologies on its website. Cookies are small text files placed on your device that help us provide and improve our services.

Categories of cookies used:

- Strictly necessary cookies — required for the website to function (e.g., session management, security). These cannot be disabled
- Analytics cookies — used to understand how visitors interact with the website (e.g., page views, session duration). We use [SPECIFY: e.g., Cloudflare Zaraz analytics integration]
- Marketing cookies — used to track visitors across websites for advertising purposes. These are only set with your consent
- Functional cookies — used to remember your preferences and settings

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You can manage your cookie preferences through your browser settings or through our cookie consent mechanism. Disabling non-essential cookies will not affect the core functionality of the website.

12. AUTOMATED DECISION-MAKING

The Company may use automated processes as part of its KYC verification, fraud detection, and risk assessment procedures. Where automated processing produces a decision with legal or similarly significant effects on the data subject, the Company will:

- Inform the data subject that automated processing is being used
- Provide meaningful information about the logic involved
- Ensure the data subject has the right to obtain human intervention, express their point of view, and contest the decision

13. SECURITY MEASURES

The Company implements appropriate technical and organisational measures to protect personal data against unauthorised access, alteration, disclosure, or destruction. These measures include:

- Encryption of data in transit (TLS/SSL) and at rest
- Access controls and role-based permissions
- Regular security assessments and vulnerability testing
- Employee training on data protection and information security
- Incident response procedures for data breaches
- Secure data centres with physical access controls

While we take all reasonable steps to protect personal data, no method of transmission over the internet or electronic storage is completely secure. We cannot guarantee absolute security.

14. CHILDREN'S DATA

The Company's services are not directed at individuals under the age of eighteen (18). We do not knowingly collect personal data from children. If we become aware that we have collected personal data from a child, we will take steps to delete that data promptly.

15. CHANGES TO THIS POLICY

The Company may update this Policy from time to time to reflect changes in our practices, legal requirements, or business operations. Material changes will be communicated to registered clients via email and will be posted on the Company's website. The date of the most recent update will be displayed at the top of the Policy.

We encourage you to review this Policy periodically.

16. CONTACT US

If you have questions, concerns, or requests regarding this Privacy Policy or the handling of your personal data, please contact us at:

NobleFXM, Ltd

Data Protection Enquiries

Email: compliance@noblefxm.com

Address: Ground Floor, The Sotheby Building, Rodney Bay, Gros-Islet, Saint Lucia, P.O. Box 838, Castries, Saint Lucia