

Website Privacy Policy

This privacy policy of the website

*(hereinafter the "**Privacy Policy**") was prepared by companies operating under the following legal names **DNKR ZA (Pty) Ltd** based in Office 114, 1st floor, Liberty Life Building, 21 Aurora Drive, Umhlanga 4301, South Africa, company no. 2017 / 657344 / 07 and **FX-EDGE V Ltd** based in 1276, Govant Bulding, Kumul Highway, Port Vila, Vanuatu, company no. 700604 and **FX-EDGE SC Ltd** based in Room 12, First floor, Kingsgate House, Vitoria, Mahe, Seychelles, company no. 8429383-1 (hereinafter referred to as "**Data Controllers**") as fulfillment of the obligation specified in Art. 13 Section 1 and 2 of the Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC (hereinafter the "**GDPR** ") and Art. 18 Section 1 of the Republic of South Africa Protection of Personal Information Act 2013 (hereinafter the "**POPIA**") and Art. 35 Section 1 and 2 Seychelles Data Protection Bill 2023 (hereinafter the "**DPB**").*

1. Who is responsible for your personal data?

The Data Controllers of your personal data are companies operating under the names DNKR ZA (Pty) Ltd based in Office 114, 1st floor, Liberty Life Building, 21 Aurora Drive, Umhlanga 4301, South Africa, company no. 2017 / 657344 / 07 and FX-EDGE V Ltd based in 1276, Govant Bulding, Kumul Highway, Port Vila, Vanuatu, company no. 700604 and FX-EDGE SC Ltd based in Room 12, First floor, Kingsgate House, Vitoria, Mahe, Seychelles, company no. 8429383-1

2. How to contact the Data Controller?

A Data Protection Officer has been appointed by the Data Controllers. In matters regarding the processing of personal data by the Data Controller, you can contact via the following e-mail address: kteofilski@fx-edge.com.

3. Data security

In connection with the conducted business activity, the Data Controllers collect and process personal data in accordance with the relevant provisions, including in particular the GDPR, the POPIA, the DPB and the principles of data processing contained therein.

The Data Controllers ensure transparency of data processing, inform about data processing and ensure that data is collected only to the extent necessary for the purpose indicated and is processed only for the period in which it is necessary.

In order to ensure data integrity and confidentiality, the Data Controllers have implemented procedures enabling access to personal data only to authorized persons and only to the extent that it is necessary for their tasks.

The Data Controllers take all necessary actions so that its subcontractors and other cooperating entities guarantee the use of appropriate security measures whenever they process personal data at the request of the Data Controllers.

4. Use of the website

When you use the Data Controllers website, standard information is downloaded, such as the IP address, type of search engine, language, access time and address of the page from which the User was redirected. These data can be collected by cookies and analytical tools.

In the event of contact from your site via the telephone numbers, e-mail addresses or complaint form, data related to the means of communication chosen by you and data provided during communication are also processed, if it is necessary to resolve the reported matter.

5. What are „cookies“?

Personalization and efficiency of services provided by the Data Controllers require saving and storing information on how you use the website. The Data Controllers do this by using small text files called „cookies“. Cookies contain little information and are saved on the User's computer or other terminal device by the server operating the website. Then the web browser sends them back to the website each time a given User uses it, thanks to which the server remembers your preferences.

The Data Controllers inform that disabling cookies in the browser used by the User may cause difficulties or inaction of some functions of the website.

As part of the Data Controllers website, two types of cookies are generally used:

- a) session cookies - temporary files that are stored on the User's end device until logging out, leaving the website or turning off the software (web browser);
- b) permanent cookies - files stored on the User's end device for the time specified in the cookie file parameters or until they are deleted by the User.

Due to functionality, the Data controllers divide cookies into three following groups:

- a) necessary - files of key importance enabling Users to navigate the website and use its functions, such as access to secure areas and to ensure security;
- b) performance - files collecting information about how Users use the website, which parts of the website you visit most often, and whether you receive error messages from websites. The data collected by these cookies are anonymous and only serve to improve the functioning of the website;
- c) functional - files recording the choices made by Users, these files can also be used to remember changes made by the User, e.g. changes in the size and font of the text.

6. Purposes and basis for data processing

Cookies are used to:

- a) adapting the content of the Data Controllers website to the User's preferences and optimizing its use; in particular, these files allow to recognize the User's device and properly display the website tailored to your individual needs;
- b) creating statistics that help understand how Users use the website, which allows improving their structure and content;
- c) maintaining the User's session (after logging in), thanks to which you do not have to re-enter your login and password;
- d) enabling interaction with social networks (e.g. publishing posts directly from the website).

The legal basis for processing in this case is the Data Controllers legitimate interest consisting in ensuring a higher quality of services.

Contact via email addresses or traditional mail:

In the case of sending to the Data Controllers via e-mail or traditional correspondence not related to the agreement concluded with Data Controller, personal data contained in this correspondence are processed solely for the purpose of communication and resolution of the matter to which the correspondence relates.

The legal basis for processing is the Data Controller's legitimate interest consisting in conducting correspondence addressed to the Data Controller in connection with business operations. The Data Controller processes only personal data relevant to the case to which correspondence relates. All correspondence is stored in a manner that ensures the security of personal data contained therein (and other information) and disclosed only to authorized persons.

Telephone contact:

In the event of contacting the Data Controller by phone, in matters not related to the concluded agreement, the Data Controller may request personal data only if it is necessary to handle the case to which the contact relates. In such a case, the legal basis is the Data Controller's legitimate interest consisting in the need to resolve the reported case related to the business activity conducted by the Data Controller.

Data collection as part of business contacts:

In connection with the conducted activity, the Data Controllers collect personal data also in other cases (e.g. during business meetings or by exchanging business cards) for purposes related to initiating and maintaining business contacts. The legal basis for processing in this case is the legitimate interest of the Data Controllers consisting in creating a network of contacts in connection with the conducted activity.

Personal data collected in such cases are processed only for the purpose for which they were collected, and the Data Controllers ensure their appropriate protection.

7. Providing data

The Data Controller's website uses cookies in accordance with the User's individual settings of the browser installed on the end device that you use. Using the Data Controller's website without changing the browser cookie settings means confirming that you have read this Privacy Policy and accept cookies.

If you do not accept cookies, you can change your settings or disable cookies at any time in your browser.

The Data Controller's inform that changing the configuration of the web browser, which prevents or limits the storage of cookies on the User's end device may result in functional limitations of the services provided. Deleting cookies while providing the service may lead to similar effects.

The following links provide information on how to delete cookies in the most popular web browsers:

Firefox - <https://support.mozilla.org/en-US/kb/clear-cookies-and-site-data-firefox>

Opera - <http://help.opera.com/Linux/9.60/en/cookies.html>

Internet Explorer - <http://support.microsoft.com/kb/278835/en>

Chrome - <http://support.google.com/chrome/bin/answer.py?hl=en&answer=95647>

Safari - http://support.apple.com/kb/HT1677?viewlocale=en_US

Due to the many technological solutions, it is not possible to provide precise guidelines on how to specify the conditions for storing or accessing cookies using the settings of all available telecommunications terminal equipment and software installed on this device.

8. Users' rights

The Data Controller's inform that in connection with the processing of personal data you have the following rights:

- a) the right to information about the processing of personal data - on this basis, the Data Controller provides you with a request for information on data processing, including primarily the purposes and legal grounds for processing, the scope of data held, entities to which it is disclosed, and the planned date of deletion data;
- b) the right to obtain a copy of the data - on this basis, the Data Controller provides you with a copy of the data processed in the event of a request;
- c) the right to rectification - the Data Controller is obliged to remove any incompatibilities or errors of personal data being processed and supplement them if they are incomplete;
- d) the right to delete data - on this basis, you can request the deletion of data the processing of which is no longer necessary to achieve any of the purposes for which it was collected;
- e) the right to limit processing - in the event of such a request, the Data Controller ceases to perform operations on personal data until the reasons for the restriction of data processing cease (e.g. a decision of the supervisory authority allowing further processing of data is issued);

- f) the right to transfer data - on this basis - to the extent that the data is processed in an automated manner in connection with the concluded agreement or consent - the Data Controller issues the data provided by you in a format that allows data to be read by a computer. It is also possible to request that the data be sent to another entity, however, provided that there are technical possibilities in this respect both on the part of the Data Controller and the indicated entity;
- g) the right to object to the processing of data for marketing purposes - you can object to the processing of personal data for marketing purposes, without giving any reason;
- h) the right to object to other purposes of data processing - you can at any time oppose - for reasons related to your particular situation - the processing of personal data that is based on the legitimate interest of the Data Controller (e.g. for analytical or statistical purposes), objection in this respect it should contain a justification;
- i) the right to withdraw consent - if the data are processed on the basis of consent, you have the right to withdraw it at any time, which, however, does not affect the lawfulness of the processing carried out before its withdrawal;
- j) the right to complain - if you find that the processing of personal data violates the provisions of the applicable law or other provisions regarding the protection of personal data, you can submit a complaint to the body supervising the processing of personal data competent for your habitual residence, place of work or place of committing alleged violation.

9. Data processing period

The period of data processing by the Data Controllers depend on the type of service provided and the purpose of processing. The period of data processing may also result from provisions when they constitute the basis for processing. In the case of data processing on the basis of the Data Controllers legitimate interest, the data is processed for a period enabling the implementation of this interest or to object effectively to data processing. If the processing is based on consent, the data is processed until its withdrawal. When the basis for processing is necessary to conclude and perform the agreement, the data is processed until its termination. The period of data processing may be extended if the processing is necessary to establish or assert claims or defend against claims, and after that period - only if and to the extent required by law. After the end of the processing period, the data is irreversibly deleted or anonymized.

10. Recipients and transfer of data outside the country

In connection with conducting operations that require the processing of personal data, personal data may be disclosed to external entities, including in particular suppliers responsible for operating IT systems and analytical tools, entities providing accounting services, postal operators, marketing agencies, legal advisers.

The Data Controllers reserve the right to disclose selected information about you to the competent authorities or third parties who submit a request for such information, based on an appropriate legal basis and in accordance with applicable law.

The Data Controllers transfer personal data outside the country only when necessary and with an adequate level of protection.

11. Automated decision-making

The Data controllers will not apply a decision that is based solely on automated processing, including profiling, and produces legal effects concerning you or similarly significantly affects you.