

# Privacy Policy

Last Updated November 2019

## 1. SCOPE

### 1.1. Privacy Policy

This Privacy Policy (this “**Privacy Policy**”) applies to information we collect or use on websites and mobile applications, including, [www.fxengineer.com](http://www.fxengineer.com) products, features, services, or any portion thereof (collectively, the “**Service**”), owned or controlled by FXE Software LLC, or its affiliated companies (“**FXE**” or “**we**” or “**our**” or “**us**”). Affiliated companies are entities that control, are controlled by or are under common control with us.

### 1.2. Changes to the Privacy Policy

Although most changes are likely to be minor, we may change our Privacy Policy from time to time, and in our sole discretion. We encourage visitors to frequently check this page for any changes to the Privacy Policy. Your continued use of the Service after any change in this Privacy Policy will constitute your acceptance the changes. The date the privacy policy was last revised is identified at the top of the page. You are responsible for ensuring we have an up-to-date active and deliverable e-mail address for you and for periodically visiting this privacy policy to check for any changes.

### 1.3. Terms of Service

This Privacy Policy, the Terms of Service (the “**Terms of Service**”), the Platform Services Agreement and the Subscription and Sublicense Agreement, all of which is incorporated herein by reference, are an agreement (collectively, this “**Agreement**”) between you (“**You**” or “**your**” or “**you**”), a user of the Service, and us. By accessing or using the Service, you acknowledge and agree to this Agreement. If you choose to not agree with this Agreement, you may not use the Service.

### 1.4. Third Party Links

The Service contains third party links to other websites or services. Please be aware that we are not responsible for the content or privacy practices of such other third party websites or services. We encourage our users to be aware when they leave the Service and to read the privacy statements of any other site that collects personal information. When you use the Service or its content, certain third parties may use automatic information collection technologies to collect information about you or your device. These third parties may include:

- Advertisers, ad networks and ad servers;
- Analytics companies;
- Your mobile device manufacturer;
- Your mobile service provider;

These third parties may use tracking technologies to collect information about you when you use the Service. The information they collect may be associated with your personal information or they may collect information, including personal information, about your online activities over time and across different websites, apps and other online services websites. They may use this information to provide you with interest-based (behavioral) advertising or other targeted content.

We do not control these third parties' tracking technologies or how they may be used. If you have any questions about an advertisement or other targeted content, you should contact the responsible provider directly.

## 2. WHAT WE COLLECT

### 2.1. Information You Provide

We may collect information that identifies you ("**Personal Data**") when you use the Service or register for an account. The types of Personal Data that we may collect includes:

**Identity Data** includes first name, last name, username or similar identifier, title, date of birth and gender.

**Contact Data** includes email address and telephone numbers when requesting services with SMS.

**Financial Data** includes bank account and payment card details.

**Transaction Data** includes details about payments to and from you and other details of products and services you have purchased from us.

**Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plugin types and versions, operating system and platform and other technology on the devices you use to access this website.

**Profile Data** includes your username and password, purchases or orders made by you, your interests, preferences, algorithm code, backtests, compile activity, feedback and survey responses.

**Usage Data** includes information about how you use our website, products and services.

**Marketing and Communications Data** includes your preferences in receiving marketing from us and our third parties and your communication preferences.

We get information about you in a range of ways:

**Information You Give Us.** We collect information you directly give us on the Service in a variety of ways, including but not limited to when you register for an account; purchase a product or service; participate in a sweepstakes, contest, rewards program or other promotion; use the Service to upload, share, or communicate any content or information; publicly post information via links to social media networks, forums, blogs, message boards, chat rooms or similar functionality; and when you request customer support or provide feedback and or survey responses.

**Information We Get From Others.** We may get information about you from other sources, such as Facebook, Twitter, Instagram or other social-media properties. Other users of the Service, including but not limited to marketplace users. We may add this to information we get from this Service.

## Information Automatically Collected

- A. Traffic and usage information generated from your visit to the Service, including traffic data, logs, pages you visit, your device's unique device identifier, mobile network, browser information, operating system, IP address, cookie information, the type of device that you use to access the Service, and any other communication data arising from your access and use of the Service;
- B. In connection with your visit or use of the Service, we may automatically collect information about our users, such as the numbers and frequency of users and their characteristics and information about similar groups of users, certain age groups or users that live in a particular geographical area. This data is only used in the aggregate as a statistical measure and not in a manner that would identify you personally. Aggregate information generally is collected through the use of cookies and beacons;
- C. Information from public databases and third parties;
- D. When you access or use the Service, or any portion thereof, we may collect physical location information that is sufficiently precise to allow us to locate a specific person or device ("**Location Information**"). We only collect Location Information with your permission (e.g., such as when you agree to provide it to us after you initially access or use the Service). We may use Location Information and provide it to third parties to provide you with content and services that are relevant to a particular location, such as advertising, search results, and directions;
- E. The Service may access metadata and other information associated with other files stored on your device. This may include, for example, photographs, audio and video clips, personal contacts and address book information.

If you do not want us to collect this information do not download the Service or delete it from your device. We also may use these technologies to collect information about your activities over time and across third-party websites, apps or other online services (behavioral tracking).

## 3. TRACKING TECHNOLOGIES

We may use one or more of the following tracking technologies, and similar future tracking technologies, to automatically collect information: cookies, local shared objects, web beacons, unique telephone numbers, general log information and referral information from third-party services.

**Cookies.** We may log information using "cookies." Cookies are small data files stored on your hard drive by a website. We may use both session Cookies (which expire once you close your web browser) and persistent Cookies (which stay on your computer until you delete them) to provide you with a more personal and interactive experience on the Service. This type of information is collected to make the Service more useful to you and to tailor the experience with us to meet your special interests and needs.

**Web Beacons.** Web Beacons, also known as an Internet tags, pixel tags, single-pixel GIFs or clear GIFs, link web pages to web servers and their cookies. Web Beacons can be embedded in web pages, videos, or emails, to collect certain types of information from your browser, check whether you have viewed a particular web page or email message, and determine, among other things, the time and date on which you viewed the content, the IP address of your computer, and the URL of the web page from which the content was viewed.

**Local Shared Objects.** Local Shared Objects, sometimes known as Flash cookies, may be used to store your preferences or display content based upon what you have viewed on various websites to personalize your visit.

**“Ad IDs” and Other In-App Tracking Methods.** There are a variety of tracking technologies that may be included in mobile applications, and these are not browser-based like cookies and cannot be controlled by browser settings. Some use device identifiers, or other identifiers such as “Ad IDs” to associate app user activity to a particular app.

**3.5. Google Analytics.** We use Google Analytics (“**Google Analytics**”), a web analytics service provided by Google Inc. (“**Google**”). Google Analytics uses “cookies.” The information generated by the cookies about your use of the Service (including your IP address) will be transmitted to and stored by Google on servers in the United States. Google will use this information for the purpose of evaluating your use of the Service, compiling reports on website activity for website operators and providing other services relating to website activity and internet usage. Google may also transfer this information to third parties where required to do so by law, or where such third parties process the information on Google's behalf. Google will not associate your IP address with any other data held by Google. You may refuse the use of cookies by selecting the appropriate settings on your browser, however, please note that if you do this, you may not be able to use the full functionality of the Service. More information about how you can opt-out is in Section 6 (Do Not Track Disclosures) below. By using the Service, you consent to the processing of data about you by Google in the manner and for the purposes set out above.

#### **4. USE OF PERSONAL DATA**

We use your Personal Data as follows:

To provide, operate, maintain, improve, and promote the Service, and any other information, products or services that you request from us.

To enable you to access and use the Service, including uploading, downloading, collaborating and sharing content, photos, images, videos and information, with other users or third parties.

To process, verify, and complete transactions, and send you related information, including purchase confirmations and invoices, to carry out our obligations and enforce our rights arising from any contracts entered into between you and us, including for billing, collection and enforcement, and to build a user database.

To send transactional messages, including responding to your comments, questions, and requests; providing customer service and support; sending you technical notices, updates, security alerts, and support and administrative messages; and, when we have location information, we use it to tailor our Service for you and others.

To process and deliver contest entries and rewards.

To send information including confirmations, invoices, technical notices, updates, security alerts, and support and administrative messages.

To communicate about promotions, upcoming events, and other news about products and services offered by us and our selected partners.

To monitor and analyze trends, usage, and activities in connection with the Service and for marketing, advertising, administrative, analytical, research, optimization, and other purposes. For example, we may use statistical analyses of usage data in order to measure interest in the various areas of the Service, for development purposes and to inform advertisers and partners in aggregate and anonymous terms about consumers who click on their advertising or other messages. IP addresses are also used for systems administration and troubleshooting purposes.

To link or combine user information with other Personal Data.

To protect, investigate, and deter against fraudulent, unauthorized, or illegal activity.

## 5. SHARING OF PERSONAL DATA

We may share Personal Data as follows:

**Advertising Partners.** Ads appearing on the Service may be delivered to users by advertising partners, who may set cookies. These cookies allow the ad server to recognize your computer each time they send you an online advertisement to compile information about you or others who use your computer. This information allows ad networks to, among other things, deliver targeted advertisements that they believe will be of most interest to you. This Privacy Policy covers the use of cookies by the Service and does not cover the use of cookies by any advertisers, each of whom maintain their own privacy policy.

**Service Providers.** We engage service providers to perform functions and provide services to us. We may share your private personal information with such service providers subject to obligations consistent with this Privacy Policy and any other appropriate confidentiality and security measures, and on the condition that the third parties use your private personal data only on our behalf and pursuant to our instructions.

**Payment Processors.** We share your payment information with payment services providers to:

- A. Process payments;
- B. Prevent, detect and investigate fraud or other prohibited activities;
- C. Facilitate dispute resolution such as chargebacks or refunds;
- D. For other purposes associated with the acceptance of credit or debit cards. We may share your credit or debit card number with payment services providers or card networks to monitor card transactions at participating merchants and track redemption activity for the purposes of providing card-linked services.

**Authorized Personnel.** Our employees, agents, consultants, contractors, or other authorized personnel, including those of our contractors, service providers, subsidiaries and affiliates, may have access to user information as necessary in the normal course of our business.

**Business Transfers.** In some cases, we may choose to buy or sell assets, or have engaged in discussions with a buyer or other successor in the event of a merger, divestiture, restructuring, reorganization, dissolution or other sale or transfer of some or all of our assets, whether as a going concern or as part of bankruptcy, liquidation or similar proceeding, in which personal information held by us about our Service users is among the assets transferred. In these types of transactions, user information is typically

one of the business assets that is transferred. Moreover, if the Service or the Company, or substantially all of its assets, were acquired, liquidated, or dissolved, user information would be one of the assets that is transferred.

**Government, Law Enforcement or Third Parties.** We may disclose any information, including, without limitation, Personal Information that we deem necessary, in our sole discretion and without your prior permission, to comply with any applicable law, regulation, legal process or governmental request. We also may exchange information, including, without limitation, Personal Information, with other companies and organizations to protect the rights, property, or safety of the Company and its affiliates, personnel, users, third parties, or others. We reserve the right to disclose a user's Personal Information if we believe, in good faith, that the user is in violation of the Terms of Service, even without a subpoena, warrant or other court order.

**Social Media Networks.** We may include applications or widgets from social media networks that allow interaction or content sharing by their users. These widgets, such as a Facebook "Share" or "Like" button, are visible to you on the web page you visit. Integration between the Service and social media networks such as Facebook, Twitter and others may allow social media networks in which you participate to collect information about you, even when you do not explicitly activate the network's application or widget. Please visit the applicable social media network's privacy policy to better understand their data collection practices and choices they make available to you. The privacy policy of the social media network controls the collection, use and disclosure of all personal information transmitted to that network.

**Push Notifications.** We may occasionally send you push notifications through our mobile applications to send you updates and other Service related notifications that may be of importance to you. You may at any time opt-out from receiving these types of communications by turning them off at the device level through your settings.

We may also share aggregated and/or anonymized data with others for their own uses.

## **6. SHARING OF MARKETPLACE INFORMATION**

When you share something in our marketplace, information on your product will be publicly viewable by other users of the marketplace. By uploading your content, you permit and consent to that this information may be viewed.

This Information may include items such as historical performance, technical descriptions and details, equity curve, live and historical Insights.

## **7. CHILDREN**

The Service is not intended for children or directed at any individual under 13 years of age (or 16 if you are a resident of the European Union ("EU")). We do not knowingly collect or knowingly solicit any information from anyone under the age of 13 (or 16 if you are a resident of the EU) or knowingly allow people under the age of 13 (or 16 if you are a resident of the EU) to register for the Service. In the event that we learn that we have collected Personal Data from a child under age 13 (or 16 if you are a resident of the EU) without parental consent, we will delete that information. If you believe that we might have

any information from or about a child under 13 (or 16 if you are a resident of the EU), please contact us at the address below.

## **8. INFORMATION CHOICES AND CHANGES**

**Choice.** In accordance with local law, your controls and choices may include:

- A. You may correct, update and delete your account information, as described below;
- B. You may change your choices for subscriptions and newsletters;
- C. You may choose whether or not to receive offers from us;
- D. You may choose whether you received targeted advertising from us or our partners.

**Opt-out.** If you do not want us to use your e-mail address and other contact information to promote our own or third parties' products or services, you can "opt-out." Our marketing emails tell you how to opt-out. If you opt out, we may still send you non-marketing emails. Non-marketing emails include emails about your accounts and our business dealings with you. You may also send requests about Personal Data to our Contact Information below. You can request to change contact choices, opt-out of our sharing with others, and update your Personal Data.

**Tracking Technologies.** You can typically remove and reject cookies from the Service with your browser settings. Many browsers are set to accept cookies until you change your settings. If you remove or reject our cookies, it could affect how the Service works for you.

**Location Information.** You can choose whether or not to allow the Service to collect and use real-time information about your device's location through the device's privacy settings. If you block the use of location information, some parts of the Service may then be inaccessible or not function properly.

**Targeted Advertising by the Company.** If you do not want us to use information that we collect or that you provide to us to deliver advertisements according to our advertisers' target-audience preferences, you can opt-out by you can opt-out by providing us notice at the address below. You can also always adjust your user advertising preferences in your account profile by checking or unchecking the relevant boxes or by providing us notice at the address below.

**Disclosure of Your Information for Third-Party Advertising and Marketing.** If you do not want us to share your Personal Data with unaffiliated or non-agent third parties for advertising and marketing purposes, you can opt-out by providing us notice at the address below. You can also always opt-out by logging into the Service and adjusting your user preferences in your account profile by checking or unchecking the relevant boxes or by you can opt-out by providing us notice at the address below.

**NAI Principles.** We may also use tracking technologies to collect information about your visits over time and across third-party services or other online services. The Network Advertising Initiative (the "NAI") is a cooperative group of ad serving providers. The NAI has developed a set of privacy principles to which its members adhere. The NAI is committed to providing consumers with clear explanations of Internet advertising practices and how they affect you and the Internet generally. For more information about the NAI, third party ad servers generally and the opt-out options offered through the NAI, visit <http://www.networkadvertising.org/index.asp>.

**Accessing and Correcting Your Information.** If you have an account, you can help ensure that your contact information and preferences are accurate, complete, and up to date by logging in to your account or by emailing us at the address below. For other Personal Data we hold, we will provide you with access for any purpose including requesting that we correct the data if it is inaccurate or delete the data if we are not required to retain it by law or for legitimate business purposes. We may decline to process requests that are frivolous/vexatious, jeopardize the privacy of others, are extremely impractical, or for which access is not otherwise required by local law.

## **9. CALIFORNIA PRIVACY RIGHTS AND DO NOT TRACK DISCLOSURES**

If California Civil Code Section § 1798.83 permits users of our Service that are California residents to request certain information regarding our disclosure of Personal Data to third parties for their direct marketing purposes. To make such a request, please contact us at the Contact Information below.

## **10. DATA SECURITY**

**10.1. Security Measures.** We have put in place physical, electronic, and managerial procedures designed to help prevent unauthorized access, to maintain data security, and to use correctly the information we collect online. These safeguards vary based on the sensitivity of the information that we collect and store. The safety and security of your information also depends on you. Where we have given you (or where you have chosen) a password for access to certain parts of the Service, you are responsible for keeping this password confidential. We ask you not to share your password with anyone.

**10.2. No Security Guarantees.** Unfortunately, the transmission of information via the internet and mobile platforms is not completely secure. Although we do our best to protect your Personal Data, we cannot guarantee the security of your Personal Data transmitted through the Service. Any transmission of Personal Data is at your own risk. We are not responsible for circumvention of any privacy settings or security measures we provide. Although we take appropriate measures to safeguard against unauthorized disclosures of Personal Data, we cannot assure you that Personal Data will never be disclosed, altered or destroyed in a manner that is inconsistent with this Privacy Policy.

## **11. USERS FROM OTHER JURISDICTIONS**

By using the Service, you acknowledge that you accept the practices and policies outlined in this Privacy Policy and consent to having your data transferred to and processed on computers located outside of your state, province, country or other governmental jurisdiction where the data protection laws may differ from those in your jurisdiction. If you do not accept this Privacy Policy, please do not use the Service. The Service is controlled and operated by the Company from the United States. If you are not a resident of the United States or you are located outside the United States and choose to use the Service or provide information to us, please note that we will transfer the information, including Personal Data, to the United States and process it there. Your acceptance of this Privacy Policy, followed by your submission of such information represents your agreement and consent to that transfer. We do not represent or warrant that the Service, or any portion thereof, are appropriate or available for use in any particular jurisdiction. Those who choose to access the Service do so on their own initiative and at their own risk, and are responsible for complying with all local laws, rules and regulations. You also are subject to United States export controls in connection with your use of the Service and are responsible for any violations of such controls, including, without limitation, any United States embargoes or other



federal rules and regulations restricting exports. We may limit the availability of the Service, in whole or in part, to any person, geographic area or jurisdiction that we choose, at any time and in our sole discretion.

## **12. FOR RESIDENTS OF THE EUROPEAN UNION (“EU”) – GENERAL DATA PROTECTION REGULATION (“GDPR”)**

This Privacy Policy describes how FXE collects, uses and shares your Personal Data. If you are a resident of the EU, you are subject to the GDPR, which becomes effective on May 25, 2018, and the following terms also apply to you. FXE is the Controller and responsible for your Personal Data. We are based in the United States, which is where all of your Personal Data will be processed.

**12.1 Data Protection Officer.** We have appointed a data protection officer (DPO) who is responsible for overseeing questions in relation to this Privacy Policy. If you have any questions about this Privacy Policy, including any requests to exercise your legal rights, please contact the DPO using the details set out below.

**12.2 Lawful Bases to Process Your Personal Data** This Privacy Policy describes the Personal Data we collect from you and how we use it. We will only use your Personal Data when the law allows us to. Most commonly, we will use your Personal Data in the following circumstances:

- Where we need to perform the contract we are about to enter into or have entered into with you.
- Where it is necessary for our legitimate interests (or those of a third party) and your interests and fundamental rights do not override those interests.
- Where we need to comply with a legal or regulatory obligation.

You have the right to withdraw consent to marketing at any time by contacting us. Specifically, we have a lawful basis for processing each type of Personal Data described in this Privacy Policy, which are as follows:

- The lawful basis for collecting your Identity and Contact Data to register you as a new customer is the performance of a contract with you.
- The lawful bases for collecting your Identity, Contact, Financial, Transaction and Marketing and Communications Data to process and deliver your purchases are (a) the performance of a contract with you and (b) it is necessary for our legitimate interests.
- The lawful bases for collecting your Identity, Contact, Profile, and Marketing and Communications Data to manage a relationship with you are (a) the performance of a contract with you and (b) it is necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services).
- The lawful bases for collecting your Identity, Contact, Profile, Usage, and Marketing and Communications Data to enable you to partake in a contest, competition or complete a survey are (a) the performance of a contract with you and (b) it is necessary for our legitimate interests (to study how customers use our products and services, to develop them and grow our business).

- The lawful basis to collect your Identity, Contact, and Technical Data to administer and protect our business and the Service is that it is necessary for our legitimate interests (for running our business, provision of administration and IT services, network security, to prevent fraud and in the context of a business reorganization or group restructuring exercise).
- The lawful basis to collect your Identity, Contact, Profile, Usage, Marketing and Communications, and Technical Data to deliver relevant Service content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you is that it is necessary for our legitimate interests (to study how customers use our products/services, to develop them, to grow our business and to inform our marketing strategy).
- The lawful basis to collect Technical and Usage Data to use data analytics to improve our Service, marketing, customer relationships and experiences is that it is necessary for our legitimate interests (to define types of customers for our products and services, to keep our Service updated and relevant, to develop our business and to inform our marketing strategy).
- The lawful basis to collect Identity, Contact, Profile, Usage, and Technical Data to make suggestions and recommendations to you about goods or services that may be of interest to you is that it is necessary for legitimate interests (to develop our products/services and grow our business).

We do not collect any Special Categories of Personal Data about you (this includes details about your race or ethnicity, religious or philosophical beliefs, sex life, sexual orientation, political opinions, trade union membership, information about your health and genetic and biometric data). Nor do we collect any information about criminal convictions and offences.

Note that we may process your Personal Data for more than one lawful ground depending on the specific purpose for which we are using your data. Please contact us if you need details about the specific legal ground we are relying on to process your Personal Data where more than one ground has been set out forth in this Privacy Policy.

**12.3 Sharing Your Personal Data.** We may have to share your Personal Data with the parties set out below for the purposes described in this Privacy Policy.

*External Third Parties.*

- Service providers acting as processors based in United States who provide automated marketing services.
- Professional advisers acting as processors including marketing agents, auditors and insurers based in United States who provide consultancy and auditing services.

We require all third parties to respect the security of your Personal Data and to treat it in accordance with the law. We do not allow our third-party service providers to use your Personal Data for their own purposes and only permit them to process your Personal Data for specified purposes and in accordance with our instructions.

**12.4 Data Security.** We have put in place appropriate security measures to prevent your Personal Data from being accidentally lost, used or accessed in an unauthorized way, altered or disclosed. In addition,

we limit access to your Personal Data to those employees, agents, contractors and other third parties who have a business need to know. They will only process your Personal Data on our instructions and they are subject to a duty of confidentiality. We have put in place procedures to deal with any suspected Personal Data breach and will notify you and any applicable regulator of a breach where we are legally required to do so.

**12.5 Data 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, 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 unauthorized 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. In some circumstances you can ask us to delete your data. In some circumstances we may anonymize your Personal Data (so that it can no longer be associated with you) for research or statistical purposes in which case we may use this information indefinitely without further notice to you.

**12.6 YOUR LEGAL RIGHTS UNDER THE GDPR.** Under certain circumstances, EU residents have rights under data protection laws in relation to their Personal Data. If you are an EU resident, you have the right to:

- Request access to your Personal Data. This enables you to receive a copy of the Personal Data we hold about you and to check that we are lawfully processing it.
- Request correction of the Personal Data that we hold about you. This enables you to have any incomplete or inaccurate data we hold about you corrected, though we may need to verify the accuracy of the new data you provide to us.
- Request erasure of your Personal Data. This enables you to ask us to delete or remove Personal Data where there is no good reason for us continuing to process it. You also have the right to ask us to delete or remove your Personal Data where you have successfully exercised your right to object to processing (see below), where we may have processed your information unlawfully or where we are required to erase your Personal Data to comply with local law. Note, however, that we may not always be able to comply with your request of erasure for specific legal reasons which will be notified to you, if applicable, at the time of your request.
- Object to processing of your Personal Data where we are relying on a legitimate interest (or those of a third party) and there is something about your particular situation which makes you want to object to processing on this ground as you feel it impacts on your fundamental rights and freedoms. You also have the right to object where we are processing your Personal Data for direct marketing purposes. In some cases, we may demonstrate that we have compelling legitimate grounds to process your information which override your rights and freedoms.
- Request restriction of processing of your Personal Data. This enables you to ask us to suspend the processing of your Personal Data in the following scenarios: (a) if you want us to establish the data's accuracy; (b) where our use of the data is unlawful but you do not want us to erase it; (c) where you need us to hold the data even if we no longer require it as you need it to

establish, exercise or defend legal claims; or (d) you have objected to our use of your data but we need to verify whether we have overriding legitimate grounds to use it.

- Request the transfer of your Personal Data to you or to a third party. We will provide to you, or a third party you have chosen, your Personal Data in a structured, commonly used, machine-readable format. Note that this right only applies to automated information which you initially provided consent for us to use or where we used the information to perform a contract with you.
- Withdraw consent at any time where we are relying on consent to process your Personal Data. However, this will not affect the lawfulness of any processing carried out before you withdraw your consent. If you withdraw your consent, we may not be able to provide certain products or services to you. We will advise you if this is the case at the time you withdraw your consent.

If you wish to exercise any of the rights set out above, please contact us. You will not have to pay a fee to access your Personal Data (or to exercise any of the other rights). However, we may charge a reasonable fee if your request is clearly unfounded, repetitive or excessive. Alternatively, we may refuse to comply with your request in these circumstances. We may need to request specific information from you to help us confirm your identity and ensure your right to access your Personal Data (or to exercise any of your other rights). This is a security measure to ensure that Personal Data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response. We try to respond to all legitimate requests within one month. Occasionally it may take us longer than a month if your request is particularly complex or you have made a number of requests. In this case, we will notify you and keep you updated.

### **13. CONTACT INFORMATION**

We welcome your comments or questions about this privacy policy. You may also contact us at our address:

FXE SOFTWARE LLC  
ATTN: Data Protection Officer  
9900 Spectrum Drive  
Austin, Texas, 78717-4555  
Telephone: (972) 439-5978  
Email: [info@fxengineer.com](mailto:info@fxengineer.com)