



## **PRIVACY POLICY**

Dexland is an Exchange owned and operated by Gpmedia Limited, who respects your right to privacy. As such, we have developed this Policy in order for our clients to understand how we collect, use, communicate, disclose and make use of your personal information.

The way in which we process your personal data shall always be in line with the General Data Protection Regulation (GDPR), and in accordance with the country-specific data protection regulations applicable to Dexland. This Policy serves as a declaration to our clients and to inform the general public not only of how we process your personal data but also to inform you of the rights to which you are entitled.

## **DEFINITIONS**

Our Privacy Policy is based on the terms used by the European legislator for the adoption of the General Data Protection Regulation (GDPR). We endeavour to ensure that our Privacy Policy is legible and understandable for the general public, as well as our customers and business partners. To ensure this, we would like to first explain the terminology used.

<b>Cookies</b>	Text files that are stored in a computer system via an Internet browser.
<b>Cookie ID</b>	Unique identifier of the cookie. It consists of a character string through which Internet pages and servers can be assigned to the specific Internet browser in which the cookie was stored. This allows visited Internet sites and servers to differentiate the individual browser of the data subject from other Internet browsers that contain other cookies. A specific Internet browser can be recognized and identified using the unique cookie ID.
<b>Consent</b>	Freely given, specific, informed and unambiguous indication of the data subject's wishes by which he or she, by a statement or by a clear affirmative action, signifies agreement to the processing of personal data relating to him or her.
<b>Google AdWords</b>	<p>A service for Internet advertising that allows the advertiser to place ads in Google search engine results and the Google advertising network. Google AdWords allows an advertiser to pre-define specific keywords with the help of which an ad on Google's search results only then displayed, when the user utilizes the search engine to retrieve a keyword-relevant search result. In the Google Advertising Network, the ads are distributed on relevant web pages using an automatic algorithm, considering the previously defined keywords.</p> <p>The operating company of Google AdWords is Google Inc., 1600 Amphitheatre Pkwy, Mountain View, CA 94043-1351, UNITED STATES.</p>
<b>Personal data</b>	Any information that makes it possible to directly or indirectly identify the natural person to which the information relates. This identifiable

information may relate to: name, identification number, location data, online identifier or one or more factors specific to physical, physiological, genetic, economic, cultural or social identity.

**Processing**

Any operation or set of operations which are performed on personal data or sets of personal data, by automated means such as collection, recording, organisation, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

**Profiling**

Any form of automated processing of personal data consisting of the use of personal data to evaluate certain personal aspects relating to a natural person, in particular to analyse or predict aspects concerning that natural person's performance at work, economic situation, health, personal preferences, interests, reliability, behaviour, location or movements.

**Pseudonymisation**

The processing of personal data in such a manner that the personal data can no longer be attributed to a specific data subject without the use of additional information, provided that such additional information is kept separately and is subject to technical and organisational measures to ensure that the personal data are not attributed to an identified or identifiable natural person.

**Restriction of processing**

The marking of stored personal data with the aim of limiting their processing in the future.

**Third Party**

Third party is a natural or legal person, public authority, agency or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorised to process personal data.

We have numerous technical and organizational measures to ensure stringent protection of personal data processed through this website. However, Internet-based data transmissions may in principle have security gaps, so absolute protection may not be guaranteed.

## **OUR RESPONSIBILITIES IN RELATION TO YOUR PERSONAL INFORMATION**

### **1. INFORMING OUR CLIENTS OF THE PURPOSE OF COLLECTING PARTICULAR INFORMATION**

Before, or at the time of collecting personal information, we will identify the purposes for which information is being collected. We will collect and make use of personal information solely with the objective of fulfilling those purposes communicated and specified by us to our clients and/or for any other compatible, legal purposes.



## **2. OBTAINING OUR CLIENTS' EXPRESS CONSENT**

We may only act upon the collected information pertaining to our clients having first obtained the express consent of our client or as required by law to make use of the information in our possession. Our clients are to note that by clicking "I Accept" on the registration page on our website, this forms part of communicating your express consent.

## **3. CONSENT TO COLLECT PERSONAL INFORMATION**

By clicking on "I Accept" on the registration page on our website you specifically provide consent to us to collect the following information from you:

- Know Your Client Information
- Information required for the defence of any claims or occurrences as a result of the use of Our services

## **4. STORAGE OF OUR CLIENTS' PERSONAL DATA**

We will only retain personal information as long as necessary for the fulfilment of those purposes and upon instruction from our client that our mandate has been fulfilled. Should you request to see your personal information held in our possession, our company is obliged to provide it to you within 30 days of your request.

## **5. HANDLING OF OUR CLIENTS' PERSONAL DATA**

Our client's information remains the possession of our clients. We recognise that confidentiality of such information is of utmost importance, and as such a priority to maintain confidential. In terms of this, we will ensure that we protect your personal information through reasonable security safeguards against loss or theft or any unauthorized access, disclosure, copying, use or modification thereof. Access to such information shall only be provided to individuals who would require such information in order to provide the services agreed upon, or to individuals who would need access for legal/regulatory reasons.

Once information provided to us by clients is in our care, we take all reasonable steps to safeguard such information. However, we cannot guarantee the security of information provided from you, prior to being in our possession ,due to the fact that usage of the internet is not entirely secure at all times.

## **6. CONSENT TO CONTACTING CLIENTS**

Our company will only ever contact our clients upon receiving your consent. By clicking on "I Accept" on the registration page on our website you specifically provide consent to us to contact you regarding the services Dexland Provides.

## **PROTECTION AND COMPLIANCE WITH CHILDREN'S ONLINE PRIVACY PROTECTION**

Protecting the privacy of the very young is especially important. For that reason, we never collect or maintain information at our Site from those we actually know are under 18, and no part of our website is structured to attract anyone under 18.

## **USE OF COOKIES IN THE FURTHERANCE OF OUR BUSINESS**

Dexland can provide the users of this website with more user-friendly services that would not be possible without the cookie setting. Through the use of a cookie, the information and offers on our website are optimized with our users in mind. Cookies enable recognition of our website users. Being able to recognise our users makes it easier for users to make use of our website.

The website user that uses cookies, e.g. does not have to enter access data each time the website is accessed, because this is taken over by the website, and the cookie is thus stored on the user's computer system. Another example is the cookie of a shopping cart in an online shop. The online store remembers the articles that a customer has placed in the virtual shopping cart via a cookie.

## **DISABLING COOKIES**

Website users may, at any time, prevent the setting of cookies through our website by means of a corresponding setting of the Internet browser used, and may permanently disable the setting of cookies. Already set cookies may be deleted at any time via an Internet browser or other software programs. This is possible in all popular Internet browsers. If the data subject deactivates the setting of cookies in the Internet browser used, not all functions of our website may be entirely usable.

## **DATA PROTECTION PROVISIONS ABOUT THE APPLICATION AND USE OF GOOGLE ADWORDS**

Our website has integrated Google AdWords. The purpose of Google AdWords is the promotion of our website by the including relevant advertising on the websites of third parties and in the search engine results of the Google search engine and an insertion of third-party advertising on our website. If an individual or our clients reach our website via a Google ad, a conversion cookie is filed on the IT system of the data subject through Google. A conversion cookie loses its validity after 30 days and *is not used to identify the data subject*. If the cookie has not expired, the conversion cookie is used to check whether certain sub-pages, e.g. the shopping cart from an online shop system, were called up on our website. Through the conversion cookie, both Google and the controller can understand whether a person who reached an AdWords ad on our website generated sales, that is, executed or cancelled a sale of goods. Information collected through the use of the conversion cookie is used by Google to create visit statistics

for our website. These visit statistics are used in order to determine the total number of users who have been served through AdWords ads to determine the success or failure of each AdWords ad and to optimize our AdWords ads in the future. Neither our company nor other Google AdWords advertisers receive information from Google that could identify our clients or individuals making use of our site. You may, at any time, prevent the setting of cookies by our website, as stated above, by means of a corresponding setting of the Internet browser used and thus permanently disable the setting of cookies. Further information and the applicable data protection provisions of Google may be retrieved under <https://www.google.com/intl/en/policies/privacy/>.

## **OUR CLIENT'S RIGHTS IN RELATION TO YOUR PERSONAL INFORMATION**

### **1. RIGHT OF CONFIRMATION**

Our clients are able to exercise their right to receive confirmation from our company whether the information we have in our possession is being processed or not. Our clients are encouraged to contact our company should they require this confirmation.

### **2. RIGHT OF ACCESS**

Our clients have the right to obtain their information held in our possession, freely and at any time, as well as request a copy of this information. This right extends to the ability of our clients to be informed which third party country or organisation we have transferred the client's information to and the safeguards put in place regarding the transfer.

- the purposes of the processing and the categories of personal data concerned;
- the recipients or categories of recipients to whom the personal data have been or will be disclosed;
- where possible, the envisaged period for which the personal data will be stored, or, if not possible, the criteria used to determine that period;
- the existence of the right to lodge a complaint with a supervisory authority;
- where the personal data is not collected from our client, any available information as to its source;
- the existence of automated decision-making, including profiling, referred to in Article 22(1) and (4) of the GDPR and meaningful information about the logic involved, as well as the significance and envisaged consequences of such processing for our clients.

### **3. RIGHT TO RECTIFICATION**

Our clients may contact our company in order to request any incorrect or incomplete information, held in our possession, corrected without any undue delay.

### **4. RIGHT TO ERASURE (RIGHT TO BE FORGOTTEN)**

Where our clients decide to terminate their relationship with us you may contact our company to request your data be returned to you or deleted from our systems where one of the following circumstances arises:

- The personal data is no longer necessary in relation to the purposes for which it was collected or otherwise processed and it is no legal ground for storage by us;
- Where our client withdraws consent to which the processing is based according to point in Article 6(1) of the GDPR, or Article 9(2) of the GDPR, and where there is no other legal ground for the processing;
- Where our clients object to the processing of their information pursuant to Article 21(1) of the GDPR and there are no overriding legitimate grounds for the processing or our client objects to the processing pursuant to Article 21(2) of the GDPR;
- The personal data has been unlawfully processed;
- The personal data must be erased for compliance with a legal obligation in Union or Member State law to which our company is subject.
- The personal data has been collected in relation to the offer of information society services referred to in Article 8(1) of the GDPR.

### **5. RIGHT OF RESTRICTION OF PROCESSING**

Our clients have the right to restrict the use of the personal data where one of the following conditions are met:

- The accuracy of the personal data is contested by our client, for a period enabling our company to verify the accuracy of the personal data;
- The processing is unlawful and our client opposes the erasure of the personal data and requests instead the restriction of its use instead;
- Where our company no longer needs the personal data for the purposes of processing, but where we are required by our client for the establishment, exercise or defence of legal claims.
- Our client has objected to processing pursuant to Article 21(1) of the GDPR pending verification whether the legitimate grounds of our company override those of the client.

## **6. RIGHT TO DATA PORTABILITY**

Our clients have the right to request that we transmit the information pertaining to that client to another organisation or controller upon that client's request/ instruction. We will transmit the information upon obtaining express consent, where it is technically possible and where such transmission would not negatively impact upon the rights and freedoms of others.

## **7. RIGHT TO OBJECT**

Unless the processing of our client's information is necessary for the performance of the task and in the public's interest and we can demonstrate compelling legitimate grounds for the processing which override the interests, rights and freedoms of our clients, or for the establishment, exercise or defence of legal claims, should you object to the processing of your personal information by our company for any of the following purpose(s):

- Direct marketing
- Research (historic or scientific)
- Statistical purposes related to Article 89(1) of the GDPR

You may inform us of your objection of profiling for the purposes one of the above reasons we will ensure that your information is no longer used for such purpose(s).

## **8. RIGHT TO WITHDRAW DATA PROTECTION CONSENT**

Our clients have the right to withdraw their consent to the processing of their personal data at any time. Should you wish to withdraw your consent, you may contact us directly and notify us of your withdrawn consent.

## **CONTACT US**

If you have any questions about this Privacy Policy, the practices of this site, or your dealings with this site, please contact us at:

Website: [www.dexland.io](http://www.dexland.io)  
Email: [support@dexland.io](mailto:support@dexland.io)