



Last updated: 16 December 2019

Currencies Direct takes data privacy very seriously and recognises the importance of protecting and respecting your personal data. This Privacy Policy describes how we manage your personal data in compliance with the Singapore Personal Data Protection Act 2012 (“**PDP**”), including the personal data we collect, how we use that personal data, to whom we disclose the personal data, your rights and key contact information.

1. Overview

To provide you with our money transfer services (also known as “e-money services”) we need to collect information about you. Our aim is not to be intrusive, and we won’t ask you unnecessary questions. Any personal data we receive about you will be subject to strict controls to minimise the risk of misuse – including unauthorised access to, or disclosure of, your personal data.

Please read this notice carefully, together with our Terms and Conditions and any other documents referred to in it. Here we set out the basis on which any personal data we collect about you or from you, or that you provide to us, will be processed by us and other parties in providing you with the services accessed through the website, apps or over the phone (“**Currencies Direct Services**”). Currencies Direct (“**our**”, “**us**” and “**we**”) commits to using your personal data only in accordance with the terms of this Privacy Policy.

For the purposes of this Privacy Policy, the term “**personal data**” means data, whether true or not, about an individual who can be identified — (a) from that data; or (b) from that data and other information which an organisation has or is likely to have access.

By visiting this website, our partners’ websites, or providing your personal data to one of our employees, for example by telephone or email, **you accept and expressly consent to our use and disclosure of your personal data and direct us to do so in the manner described in this Privacy Policy.**

This includes consenting to the processing of any sensitive personal data you provide, as described below in section 2. It also includes personal data you provide when you browse our website, request a quote, register for an account, enter into a contract for the supply of money transfer services, enter a competition, promotion or survey and when you contact us for other reasons.

If you have concerns about any of the terms of this Privacy Policy, please call us so that we can provide further information.

A special note about children

Children are not eligible to use Currencies Direct Services. We respectfully ask that minors (persons under the age of 18) do not submit any personal data to us or use Currencies Direct Services.

2. What personal data we collect

Personal data we may collect from you

We may collect and process the following personal data about you:

Personal data you provide to us

You may provide us with personal data by filling in forms on our website, our partners' websites or by talking with us by over the phone or corresponding with us via email or otherwise.

This includes personal data you provide when you browse our website, request a quote, register for an account, enter into a contract for the supply of money transfer services, enter a competition, promotion or survey and when you contact us for other reasons.

Initial information

To open a Currencies Direct account or use Currencies Direct Services, you must provide your name, address, phone number and email address – and we may ask you to provide identity document number(s) (for example, your identity card, employment pass or passport number) and copies of documents which evidence your identity (for example, copies of your most recent utility bill).

In order to make payments using Currencies Direct Services, you may be asked to provide debit card details (including the long number, start and expiry dates and the card verification value code (CVV/CVC)) and your destination bank details (account number, sort code, IBAN, SWIFT, ABA or routing number).

We may also ask you to choose two different security questions to answer (such as your city of birth or your pet's name). If we ask you to set up these security answers, we will be unable to provide our services unless you provide this information.

Additional verification information

We may ask you to send us additional information if:

- we cannot verify the information or personal data that you provide; or
- a query is raised by background checks (see below); or
- if you send or receive certain high-value transactions or high overall payment volumes through Currencies Direct Services; or
- as is otherwise required in order for us to comply with our obligations under money laundering regulations.

The additional information may include identity document number(s) (for example, your identity card, employment pass or passport number) and copies of documents which evidence your identity (for example, copies of your most recent utility bill), or other information verifying your identity and address, or to answer additional questions to help verify your information.

We may also ask for evidence of source of funds or wealth, for example bank statement, investment statement, business transaction summary, proof of property sale or probate documents.

When we communicate

When you communicate with us for customer service or other purposes, including by phone, email or using other methods, we retain that personal data and our responses to you.

We record calls on our telephone lines for quality control purposes, as evidence of transactions and to fulfil regulatory requirements. Any personal data you disclose to us will be held on these recordings, with the exception of debit card numbers, which are not recorded to comply with The Payment Card Industry Data Security Standard. We also record any phone number used to call us where a call is connected and the number not withheld.

We ask that you do not disclose sensitive personal data, such as the state of your health, in any communication, however if you should do so voluntarily, you consent for us to hold such personal data in our communication records and phone recordings (see further details below).

Personal data we collect when you use our website or app

When you arrive at or leave the Currencies Direct website, whether connected by a fixed line or wirelessly, we receive the web address of the site that you came from or are going to.

While you are using our site we collect information (including personal data) on the services you search for or view, page response times and length of visits to specific pages, how you interacted with each page (including scrolling, clicks and mouse-overs), and methods used to browse away from the page.

We collect information (including personal data) about the device you are using, such as the type of device, operating system and platform, the type and version of browser, browser plug-in types and versions, the times you access our website/app and the time zone setting, mobile network information and unique device identifier, which may include your device's IMEI number and/or MAC address, or the mobile phone number used by the device. We do not capture GPS information about you.

If you give us permission, our app may collect information (including personal data) stored on your device, including contact information from your address book, photos, videos or other digital content. The app may periodically re-collect this information in order to stay up-to-date.

Photographs and facial imaging

If you use certain functionalities provided by us (including our mobile website or app) we may ask you to use your device's camera to verify your identity using facial recognition in order to provide these specific services. Your face must be recognisable.

Transaction information

When you use Currencies Direct Services to purchase currency or send currency to someone else, we ask you to provide information (including personal data) related to that transaction. This information includes the amount, currency and type of the transaction, source of funds, exchange rate, recipient name and bank details, recipient address for some jurisdictions and, optionally, the recipient's email address and phone number.

Individuals who are not registered users of Currencies Direct Services

Connected Parties

If it is necessary for you to provide personal data about other individuals in the course of dealing with us, for example regarding directors and shareholders of a company, or the other party to a joint account, you should do so only where you are authorised by those individuals. By providing the personal data of these individuals to us, you hereby represent and warrant that you have obtained the consent of these individuals to disclose their personal data to us, and for us to collect, use and disclose their personal data for the purposes of providing the e-money services to you.

Recipients

When you engage an individual who is not a Currencies Direct customer in a transaction, e.g. by sending a payment to that individual, we will retain the personal data of that individual that you submit to us, including, for example, the other party's name and/or bank details. By providing the personal data of these individuals to us, you hereby represent and warrant that you have obtained the consent of these individuals to disclose their personal data to us, and for us to collect, use and disclose their personal data for the purposes of providing the Currencies Direct Services to you.

Privacy policy notification to 3rd parties

Although the personal data on Connected Parties and/or Recipients is stored for a certain period of time in compliance with applicable law, we will not use it to market to the non-registered person.

Additionally, these persons have the same rights to access and correct personal data about themselves as registered users of Currencies Direct Services. You should bring this Privacy Policy to their attention at the earliest opportunity so they are aware of how their personal data will be processed by us and aware of their rights in relation to that personal data.

Personal data about you that we receive from third parties

Fraud prevention checks

To protect ourselves and our customers against fraud, we verify the personal data you provide with Anti-Fraud Agencies and Electronic Identity Verification Services. In the course of verification, we receive information (including personal data) about you from such services.

If you register a debit card or bank account with Currencies Direct, we will use card authorisation and anti-fraud screening services to verify that your bank or card information and address match the information (including personal data) you supplied to Currencies Direct, and that the card has not been reported as lost or stolen.

Identity verification using Electronic Verification Providers

Any electronic identity check with a credit agency may leave a record on your credit file. By agreeing to the terms of this Privacy Policy, you agree that we may carry out such searches in the knowledge that it may leave a record on your credit history. If you are a joint account holder, in certain circumstances credit agencies may link your record with your spouse, partner or other financial associates.

Background checks

We conduct a background check on all our customers (and for business customers, also on the business's directors, shareholders and partners). During this process we will obtain information

(including personal data) about you and/or your business, its directors, shareholders and partners, from an identity verification provider.

Social media

If you allow us to, we will collect friend lists from Facebook and similar personal data from other third parties such as Twitter and Google – the app will periodically re-collect this personal data in order to stay up-to-date – and we may collect other personal data you have chosen to make publicly available on social media sites. Where we are one of your connections on a social media site, we may also collect personal data you have chosen to share with your connections on that site.

Information about you from other sources

We may also collect personal data about you from other sources, including other companies (subject to their privacy policies and applicable law), and from other accounts we have reason to believe you control.

We may receive personal data about you if you use any of the other websites we, or our group companies, operate or the other services we provide. We are also working closely with third parties (including, for example, business partners and affiliates, customers who participate in our refer-a-friend programme, service providers, advertising networks, analytics providers, and search information providers) and may receive personal data about you from them. This may be combined with the personal data you provide to us.

We will use personal data we receive from business partners for marketing purposes only if you have provided your consent to do so, either to the third party which collected the personal data, or to us.

Sensitive data

For the purposes of this Privacy Policy, sensitive personal data includes information revealing racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, data concerning health, sex life or sexual orientation, and information on criminal convictions and offences.

It is Currencies Direct's policy that we do not ask for or collect any of the above sensitive personal data from you or any other party, so we therefore ask that you please do not reveal any such sensitive personal data about yourself or others in any communication with us.

If you do reveal sensitive personal data, for example by phone or in an email, you will be giving express consent for us to process that sensitive personal data by storing the recording of the telephone call, or the email or other communication.

3. How we use your information

Our primary purpose in collecting your personal data is to provide you with a safe, smooth, efficient and customised experience. By submitting your personal data to Currencies Direct and using Currencies Direct Services you agree that we may use your personal data for the following purposes:

Fulfilling your requests

We will use your personal data to:

- provide you with the information, products and services that you request from us, including providing you with money transfer services and quotes;
- complete any transaction you are undertaking with us; and
- administer any promotion, survey or competition that you enter via our website(s).

Compliance and risk management

As an authorised or regulated financial institution, we are obliged to carry out background checks on individuals, companies and connected parties, and to monitor ongoing transactions. This is to prevent fraud and money laundering, including to help protect your accounts from fraudulent activity and to allow us to alert you and/or relevant law enforcement agencies if we detect such fraudulent activity on your account.

We carry out checks to ensure we do not deal with countries, entities or individuals that are subject to sanctions, to comply with counter-terrorist financing and anti-money laundering regulations and to identify high-risk individuals where we need to add additional controls. We also conduct investigations into actual or suspected violations of our Terms of Use.

Communication and customer service

We communicate with our users on a regular basis via email, phone and SMS to provide requested services and help you manage your account. These activities include:

- responding to requests for customer service;
- confirming information concerning a user's identity, business or account activity;
- informing users if we believe their accounts or any of their transactions have been used for an illegitimate purpose;
- resolving customer complaints;
- carrying out collection activities;
- resolving disputes about billing or transactions;
- conducting customer surveys; and
- investigating suspicious transactions.

We use your email and physical address to:

- confirm your opening of a Currencies Direct account;
- send you notice of money transfers that you send or receive through Currencies Direct;
- send you information about important changes to our products and services, including notice of any times that our services may not be available; and
- send notices and other disclosures required by law.

Users cannot opt out of these communications, but they will be service-oriented and not promotional in nature.

As we are obligated to send these communications to current customers, if you do not wish to receive these communications at all, then unfortunately you must close your account, however if you do not

wish to receive them in a particular way, please contact us to advise us of your preferred communication method.

Marketing

We also use your email address to send you other types of communications that you can control, including newsletters, customer surveys and special promotions. These communications are to:

- provide you with information about services we or other Currencies Direct Companies offer that are similar to those that you have already enquired about or purchased;
- provide news about currency market movements, marketing and advertising messages, updates on the services we offer, and promotional offers based on your activities when using the Currencies Direct Services;
- measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you, which may be based on your activity on our website(s) or third parties' websites;
- make suggestions and recommendations to you and other users of our website(s) about services that may interest you or them, which may be based on your activity on our website(s);
- keep you informed about currency market events and news; and
- tell you about new products and features we are developing that you may find useful.

You can choose whether to receive some, all or none of these communications and the methods by which you receive them when you request a quote, enquire or complete the registration process (or at any time thereafter) by logging in to your account on the Currencies Direct website, visiting your profile page and accessing the preference centre – or by calling us and amending your preferences over the phone.

We may also send you SMS messages for the same purposes if you have provided your consent for us to do so.

Service improvements and account management

We will use your personal data to deliver and improve Currencies Direct Services and manage your account, including:

- verifying your identity, including during account creation and password reset processes;
- performing credit and solvency checks, validating the accuracy of information, and verifying it with third parties;
- resolving disputes, collecting fees and troubleshooting problems;
- allowing us to manage risk and to detect, prevent, and/or remediate fraud or other illegal or prohibited activities;
- detecting, preventing or remediating violations of our policies, Terms and Conditions or other user agreements;
- providing you with customer support services including notifying you of changes to our service, including any outages, and to send you service emails relating to your account and transactions on your account;
- improving our existing, and developing new, products, services, websites, apps and capabilities;

- administering our website(s) and for internal business administration and operations purposes, including storage, backup, archiving, troubleshooting, data analysis, testing, research, statistical and survey purposes; and
- as part of our efforts to keep our site safe and secure, including managing and protecting our information technology infrastructure.

Device information

We will use such device information (which may include your personal data) to:

- administer our website(s) and the app for internal operations, including troubleshooting, data analysis, testing, research, statistical and survey purposes;
- improve our website(s) and the app to ensure that content is presented in the most effective manner for you and for your computer;
- to allow you to participate in interactive features of our service, when you choose to do so;
- as part of our efforts to keep our website(s) and the app safe and secure;
- to measure or understand the effectiveness of advertising we serve to you and others, and to deliver relevant advertising to you;
- to make suggestions and recommendations to you and other users of our website(s) and the app about goods or services that may interest you or them;
- to verify your identity, protect against fraud, comply with anti-financial crime laws and to confirm your eligibility to use our products and services; and
- to comply with our regulatory obligations.

Location information / IP (Internet Protocol) address:

We will use information (which may include your personal data) about your location, derived from your IP address:

- to deliver relevant advertising to you, for example, information on tailored money transfer services for your region; and
- to protect against fraud.

Third party information

We will combine third party information (which may include your personal data) with personal data you provide to us and that we collect about you. We will use all of such personal data:

- to help us better understand your financial circumstances and behaviour so that we may make decisions about how we manage your Currencies Direct Account;
- to process applications for products and services available through us including making decisions about whether to agree to approve any applications;
- for the purposes set out in the sections above (depending on the types of information we receive).

Questionnaires, surveys, competitions and profile data

From time to time we may offer you optional questionnaires, surveys and competitions. If you choose to answer these questionnaires, surveys or competitions, we may use your personal data to improve Currencies Direct Services, send you marketing or advertising information, manage the competitions and

for such purposes as collecting demographic information or assessing users' interests and needs. You will be given notice of how the personal data will be used prior to your participation in the survey, questionnaire or competition.

Accessing and changing your personal data

You can review the personal data you have provided to us and make any desired changes to your information or to the settings on your Currencies Direct account at any time by logging in to your account on the Currencies Direct website, visiting the profile page and changing your details.

4. Cookies

Our website uses cookies to distinguish you from other users of our website. This helps us to provide you with a good experience when you browse our website and also allows us to improve our site and to provide interest-based advertising. You may adjust the settings on your browser to refuse cookies but some of the services on our website(s) may not work if you do so. For detailed information on the cookies we use and the purposes for which we use them see our Cookie Policy.

5. Disclosing personal data to third parties

To support our business and provide services to you

Just like most banks and financial/payment service providers, Currencies Direct works with third-party service providers (including banking partners and banking intermediaries) who provide important functions that allow us to make our money transfer services easier, faster, and safer.

This includes business partners under contract with us who support our business operations, such as fraud prevention, bill collection, marketing, customer service, contract administration and technology services. We need to disclose user' personal data to them from time to time so that the services can be performed. Our contracts dictate that these business partners are in compliance with applicable data protection and privacy laws and that they only use your personal data in connection with the services they perform for us and not for their own benefit.

By accepting this Privacy Policy and maintaining an account with Currencies Direct, you expressly consent to the disclosure of your personal data to those third parties for the purposes listed.

Banks and payment providers

When you ask us to process a currency or payment transaction, we will disclose your personal data to the business partners who are contracted to Currencies Direct to complete this transaction, for example passing bank details to correspondent bank(s) or payment provider(s) involved in the transaction.

Anti-fraud, anti-money laundering, sanctions and risk management

To carry out the checks described in section 3, we will provide your personal data to our third party business partners who carry out these checks, including photographs of yourself or identity document number(s) and copies of identification documents which evidence your identity that you have provided to us.

Reporting to regulators

As a regulated financial institution, in some jurisdictions we are obliged to report transactions to the relevant financial regulator. We will provide your personal data to the regulators to meet these legal obligations.

Credit card associations and legal process

We may also disclose necessary personal data in response to the requirements of credit card associations or a civil or criminal legal process.

We may disclose or share your personal data in order to enforce or apply the Terms and Conditions – and other agreements – between you and us, or to investigate potential breaches to protect the rights, property, or safety of Currencies Direct, our customers, or others. This includes exchanging personal data with other companies and organisations for the purposes of fraud protection and credit risk reduction and, if required, to obtain professional advice.

Where required by law

We may disclose necessary personal data to the police and other law enforcement agencies, security forces, competent governmental, intergovernmental or supranational bodies, competent agencies, departments, regulatory authorities, self-regulatory authorities or organisations, and other third parties, including Currencies Direct Group companies, where we are legally compelled and/or permitted to do so.

Mergers and acquisitions

As with any business, it is possible that in the future Currencies Direct could buy, merge with, or be acquired by, another company. We may disclose your personal data to the prospective seller or buyer of such business or assets, along with its professional advisers. If Currencies Direct or a substantial proportion of its assets are acquired by a third party, personal data held by us about our customers will be one of the transferred assets, and such successor company would continue to be bound by this Privacy Policy unless and until it is amended.

Analytics and search engine providers

We share your IP address with analytics and search engine providers that assist us in the improvement and optimisation of our site, and also for 3rd party advertising on 3rd party websites. See also our Cookie Policy.

Affiliates

If you are referred to us by a third party – either via our affiliate network or via the refer-a-friend promotion – depending on the arrangement, we may notify them when you book a transaction.

We may also disclose your personal data, including transactional information, with certain partners who have referred you to us for reconciliation purposes.

We have a select group of affiliates to whom we occasionally refer customers. If we think you may benefit from these services, we will ask you if you would like us to pass on your details. We will always name the affiliate and ask you for permission before we refer you, and we will pass on your details only

where you give us permission to do so. If we refer you, we will typically pass on your name, email address and telephone number, but may pass on other forms of personal data if you have provided your consent for us to do so.

Third party websites

Our site may, from time to time, contain links to the websites of our business partners, advertisers and affiliates.

If you request a quote directly on a third-party website or via a third party application, any personal data that you enter on that website or application (and not directly through the website) may be disclosed with the owner of any such third party website.

Please note that these websites have their own privacy policies and we do not accept any responsibility or liability for those policies. Please check those policies before you submit any personal data to third party websites.

6. Transferring data overseas

Currencies Direct is committed to adequately protecting your personal data regardless of where the data resides and to providing appropriate protection for your personal data where such personal data is transferred outside of Singapore.

The personal data that we collect from you may be transferred to, and stored in, a country outside Singapore. It may also be processed by staff operating outside Singapore who work for us or for our suppliers. These staff may be engaged in the fulfilment of your request, the processing of your payment details and the provision of support services.

Where your personal data is to be transferred out of Singapore, we will comply with the PDPA in doing so. This may include us entering into contract(s) with the overseas recipient so that the overseas recipient is bound by legally enforceable obligations to provide to the personal data transferred a standard of protection that is comparable to that under the PDPA.

Each time you attempt to make a money transfer using your Currencies Direct account, Currencies Direct may transfer your relevant personal data to the recipient and any intermediate banks or payment service providers, who may be located outside Singapore, and any other service providers as described above, in order to process, execute or otherwise deal with and provide information about the payment.

By submitting your personal data and making use of Currencies Direct Services, you agree to such transfers, storing or processing. We will take all steps reasonably necessary to ensure that your personal data is treated securely and in accordance with this Privacy Policy.

We will do our best to protect your personal data, however we cannot guarantee the security of your personal data transmitted to our site or sent to us by email or other non-secure electronic methods; any such transmission is at your own risk. Once we have received your personal data, we will make reasonable security arrangements to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks of your personal data.

7. Data Retention Policy

By providing your personal data to us, you accept that we may retain your personal data for as long as it is necessary to fulfil the purposes (set out in section 3) for which such personal data had been collected or other legal or business purposes. Commercially reasonable steps will be taken to delete, destroy or anonymise your personal data when it is no longer necessary for any of the purposes or other legal or business purposes.

For example, we are obliged by financial markets laws to retain account data for at least 5 years after the closure of an account. In some circumstances, such as an enquiry from a law enforcement agency, we may have to hold it longer. We may also retain personal data for such periods if required to protect our interests, for example in case of litigation. Where you have asked us not to contact you, we will retain that information on a 'do not contact' list to reduce the risk of us contacting you in the future.

8. Systems Security Policy

Currencies Direct has reasonable security arrangements in place designed to prevent unauthorised access, collection, use, disclosure, copying, modification, disposal or similar risks of personal data. Only authorised employees of Currencies Direct and our business partners processing data on our behalf have access to your personal data. All Currencies Direct employees who have access to your personal data are required to comply with our privacy policy. All business partners are requested by Currencies Direct to ensure that any of their employees who have access to your personal data have signed non-disclosure agreements. Contracts with business partners acting as data processors for Currencies Direct involving personal data require an adequate level of security and require that personal data is processed only as instructed by Currencies Direct.

System security and monitoring

To ensure data privacy, confidentiality and integrity, all personal data disclosed, shared, stored or used and any transactions performed by you through our website and app are encrypted.

To provide a secure environment for our website and app, we hold your personal data in secure data centres with high levels of physical and technical security, including using firewall systems, data encryption and anti-virus protection. We use security surveillance systems to detect and prevent illegitimate access to and activities on our systems. External security experts conduct regular security reviews on our systems and we work with them to keep abreast of information security technology developments and implement relevant enhancement.

However, we cannot completely guarantee the security of any personal data and hence we cannot be responsible for any unauthorised use of personal data by third parties that is attributable to factors beyond our reasonable control.

Password security

To control access to our services, every customer is required to input a Username and Password. To help us protect your personal data, you are advised to do the following:

- Do not choose a password that could be easily guessed by another person.

- Avoid using personal data such as your name, national identification number, birth date or telephone number, or ordinary words found in a dictionary.
- Memorise your password - do not write it down.
- Never reveal the password to anyone else. We will never ask you for your password and you should not disclose it to anyone claiming to work for us or our business partners.
- Do not use the same password on other services.

Customer responsibilities

We keep our security technology up-to-date to protect your personal data, but we do not have control over the devices you use to access Currencies Direct Services.

It is your responsibility to safeguard your online information and transactions by taking all reasonable measures which may include the following:

- Do not share your information (including personal data) or provide any opportunities for anyone to gain access to your information through your devices, including tablets, phones, watches or laptops.
- Do not click on any internet link contained in an email or SMS which directs you to a Currencies Direct website. Always manually type our address www.currenciesdirect.com into your internet browser or use the app.
- Log out and close your browser before visiting other websites once you have completed your transactions.
- Ensure that you use the latest version of your internet browser and that you have up-to-date anti-virus, firewall and other security software installed on your device.

9. Customer rights

You have the following rights:

To ask us to correct any personal data we hold about you if it is incorrect.

Whilst we endeavour at all times to keep your personal data accurate, we welcome your corrections. You can correct your profile at any time by logging onto your account via the Currencies Direct website, or you can call your account manager to make any changes. We may ask you for additional verification information if you are changing certain personal data such as your name or your address.

Where you have requested for us to assist in the correction of your personal data, we will endeavour to respond to your request within 30 days from the day of receipt of such correction request. Where we are unable to do so within the said 30 days, we will notify you of the soonest practicable time within which we can make the correction.

To ask us not to process your personal data where you previously gave consent

You may withdraw your consent for the collection, use, and/or disclosure of your personal data in our possession or under our control, for any of the purposes listed in section 3, or to not receive materials or communications from us. However, please note that we will need enough information from you in order to ascertain your identity as well as the nature of your request, so as to be able to deal with your request. Your request shall be processed within a reasonable time from such request.

Please also note that this may affect our ability to provide you with the Currencies Direct Services. We will inform you of the likely legal consequences of withdrawing your consent, including our inability to provide you with Currencies Direct Services or proceed with a specific transaction and/or termination of your account.

To ask for a copy of the personal data we hold about you or to correct your personal data.

You may access your personal data in our possession or under our control. When we receive such an access request, we will endeavour to respond to your request within 30 days from the day of receipt of such access request. Where we are unable to respond to you within the said 30 days, we will notify you of the soonest possible time within which we can provide you with the information requested.

Please also note that we may charge a reasonable fee for the handling and processing of your requests to access your personal data. In such a case, we will provide you with a written estimate of the fee we will be charging. Please note that we are not required to respond to or deal with your access request unless you have agreed to pay the fee.

To ask us not to process your personal data for marketing purposes.

You can do this by checking or unchecking certain boxes on the forms we use to collect your personal data, or by logging onto your account and managing your contact preferences, or by clicking on the 'unsubscribe' link(s) at the foot of every marketing or promotional email.

You may exercise any of the above rights by contacting us at dataprotection@currenciesdirect.com or by calling your Account Manager.

10. Contacting us

The Data Protection Officer

The Data Protection Officer is Currencies Direct Limited, Registered office address 1 Canada Square, Canary Wharf, London, United Kingdom, E14 5AA, Company number 03041197.

Contacting us with questions or requests

If you want to exercise your right to access your personal data or have any questions about this Privacy Policy, Currencies Direct's information practices, or your dealings with Currencies Direct, you can contact us via our website, or by calling the customer service number located on our website, or by writing to us at Currencies Direct 1 Canada Square, Canary Wharf, London, United Kingdom, E14 5AA.

Complaints to the Data Protection Officer

If you believe that we have breached a privacy law with which we should comply, please send an email to dataprotection@currenciesdirect.com. We aim to respond in a reasonable time, normally within 30 days. Our Compliance team and Data Protection Officer will look after your complaint and will give you additional information about how it will be managed.

11. Changes to this Privacy Policy

We may amend this Privacy Policy at any time, as new features are added to the Currencies Direct Services or as we incorporate suggestions from our customers. Any changes we may make will be posted here, so please check back frequently.

Your continued use of our website(s) after a posting of a new version of this Privacy Policy will constitute your acceptance of, and agreement to, any changes. If you disagree with the terms of this Privacy Policy, you may close your account at any time.