

Privacy Policy of X-Trade Brokers Dom Maklerski S.A.

I. General provisions

The objective of the herein Privacy Policy ("**Policy**") is to provide a detailed description of the methods applied by X-Trade Brokers Dom Maklerski S.A. with the registered office in Warsaw at ul. Ogrodowa 58 and/or its branches and subsidiaries (hereinafter: "**XTB**", "**we**", "**us**") to collect and use information provided by Users of this website ("**Website**"), including – where applicable – personal data. Please read this Policy carefully.

II. Protection of personal data and other data of Website users

XTB pays particular attention to respecting privacy of persons using our website and any applications available through the Website. Any personal data obtained through our Website are processed in compliance with applicable national regulations issued on the ground of Directive of the European Parliament and of the Council of 24 October 1995 on the protection of individuals with regard to the processing of personal data and on the free movement of such data No. 95/46/EC (Official Journal of the EU L 28, 23/11/1995, P. 0031-0050). Our priority it so ensure protection of the rights and freedoms of individuals who provide us with their personal data. Use of the Website in the basic scope does not require provision of the user's personal data to XTB. Provision of the personal data by the user is completely voluntary; however, provision of certain data is required for performance of the services by XTB.

We understand the importance of maintaining confidentiality with regard to personal data. While providing us with his or her data, the user may be certain that we will do our best to keep it secret. We have undertaken measurable steps to ensure that users' data remain confidential, secure and intact.

If the user decides to open a demo account or a real account, XTB will require certain information. The information may include first name and surname, address, date of birth, contact information, data for execution of payments, as well as other necessary information. Periodically, we may also require other information in order to improve the services we provide. Most information is obtained directly from you by means of application forms or other forms, as well as by maintaining registers of information provided to us during ongoing performance of services in favour of our customers. We may also collect information on how the user uses the Website, e.g. pages visited by the user, frequency and duration of the user's stay at the Website and transaction related activities.

Data obtained from users will only be used to provide the information and services which the user may request us to provide, and to improve the quality of our services. Unless the user is notified otherwise,

personal data kept by us will be used in connection with opening and maintaining the user's account, performance of ongoing reviews of the user's needs, improvement of customer service and products as well as for notifying users of available opportunities which, in our opinion, may turn out important to them.

In the moment of received personal data XTB became an administrator in the meaning of Personal Data Protection Act dated on 29th August 1997 (Journal of Law 1997, No. 133, item 883 as amended).

Access to users' data is only granted to those employees or partners who require that information to provide support related to execution of users' instructions connected with our products or services. We have implemented procedures connected with securing and using personal data.

Although XTB undertakes all necessary efforts to ensure security of data provided to us, the user acknowledges that using the Internet is not completely safe and, therefore, we cannot always guarantee security or inviolability of personal data provided to us by the user(s) over the Internet.

The user may at any time notify XTB that his or her data changed or request XTB to delete the user's personal data. In compliance with the user's instruction, we will amend or delete the personal data from our database, however, excluding the scope in which we are obliged to maintain the data on the ground of regulations or laws to provide the requested services to the user, or to maintain respective business registers.

Pursuant to valid laws on the protection of personal data, the user is entitled to receive copies of all his or her personal data and to inform us of all observed inaccuracies. However, certain exceptions to this rule are foreseen.

In order to submit a request regarding access to the data, the user ought to contact us, verify his or her identity and specify the information in question.

III. Use of cookies - COOKIES FILES

XTB uses cookies files to gather information.

Cookies files are small data files, in particular, text files, which are stored in the terminal equipment (hard disc) of the Website User and are destined for the use of Websites. Cookies files usually contain the name of the website, which they originate from, the duration of their storage in the terminal equipment as well as the unique number.

XTB uses cookies files for the following purposes:

- (a) to provide the User with more precise and comfortable use of the Website, tailoring the content of the XTB internet websites to the User's preferences as well as to optimise the use of the Website. In particular, such files enable to detect the equipment of the User of the Website and properly display the internet website adjusted to the User's individual needs.
- (b) to examine the activity of the Website's User in order to create statistics, which help us to understand in what way the Website's Users use the internet websites, which contributes to the improvement of the structure and content of those sites as well as identification of the source, which the User has used to enter the Site.
- (c) to maintain the session of the Website's User (after logging-in).

The cookies are often used by many sites in Internet. The User may elect whether and in what way the cookie will be accepted through the change of preferences and options in his/her browser. If the User decides to shut down the cookies support in his/her browser, the access to some parts of the Website may be impossible.

XTB uses two main kinds of cookies files:

- (a) persistent cookies are stored in the User's terminal equipment for the period of time defined in the parameters of the cookies files, or by the time they are deleted by the User.
- (b) session cookies – stored in the User's terminal equipment by the time of logging-out.

In many cases the software which is used for viewing the internet websites implicitly allows the storage of cookies files in the User's terminal equipment. The Users of the Website may, at any time, change the settings regarding cookies files. Such settings may be changed, in particular, in such a way, so as to block the automatic processing of cookies files in the settings of the internet browser, or inform each time about their placing in the User's equipment. The detailed information about the possibility and ways of processing cookies files, including, the disabling, blocking and deleting cookies files, is available in the settings of the software for a concrete internet website.

Information on disabling the handling of the cookies files for the most popular internet websites:

(a) For internet browser Internet Explorer 9;

1. Click "Tools" and then "Options" in the browser window.
2. Then click the "Privacy" tab and move the slider to the highest position to block all cookies files, or to the lowest position to accept all cookies files.
3. Then click "ok".

(b) For internet browser Internet Mozilla Firefox:

1. At the top of the Firefox browser window, press the button Firefox (in XP Windows click Menu Tools) and choose "Options".
2. Choose "Privacy" panel.
3. Choose from the dropped down menu "Firefox Programme" option "will use settings of the user's history".
4. Uncheck the function "Accept cookies".
5. Press key "ok"

(c) For internet browser Internet Google Chrome:

1. Choose "Settings".
2. Click "Show Advanced Settings".
3. In section "Privacy", click "Content Settings".
4. In section "Cookies files", click "All cookie files and site data" to open the dialogue window "Cookie files and other data".
5. Choose "Block the attempts to enter the site data into the computer".

XTB announces that the limitations in the use of cookies files may have an impact on the operations of some functionalities available on the Websites.

Not making changes of the settings of the internet browser for the settings blocking the writing of the cookies files is equivocal with the granting of consent for their writing.

You may find more information on cookies at the address: www.aboutcookies.org, or in section Help in the internet browser menu.

This Policy refers to the use of the cookies only through this Website and is not applicable to their use by any third party.

If a User opens an account with us, he, or she will have to use our software which makes possible for us to use cookies with regard to the User's access to this Website.

IV. Links to other websites

Links to websites of other entities are available at our Website. The links are provided for the user's convenience, but we do not review, control or monitor privacy practices applied at third parties' websites. Our Policy does not relate to websites maintained by third parties. We are not liable for the activities of websites maintained by third parties or transactions performed with such persons.

V. Final provisions

XTB reserves the right to amend this Policy. Amendments are performed by publication of the new Policy at the Website. Amendments become effective at the time of implementation. Users are encouraged to acquaint themselves periodically with the text of this Policy in order to track amendments to its provisions.

Using this website means acceptance of this Policy. If the user does not accept it, XTB will not enable access to its services and use of the services must be stopped immediately.

Any disputes regarding this Policy, if not resolved amicably, will be resolved by the court of competent jurisdiction.