

# Privacy policy for FX City

## Preamble

•The website FX City is a trademark of England.pl Sp. z o.o., which is a National Payment Institution authorized by the Polish Financial Supervision Authority.

## Definitions

•Meaning of terms used in this Privacy Policy:

•England.pl Sp. z o.o. - means the company England.pl Sp. z o.o. established in accordance with the provisions of Polish law. Headquarters at: 75-502 Koszalin, ul. Marszałka Józefa Piłsudskiego 45. Registered at the District Court in Koszalin, IX Division of the National Court Register. KRS No. 0000362067; REGON 320877907; NIP 6692501424 with a share capital of PLN 600,000 paid in full.

•England.pl Sp. z o.o. in Koszalin, Stratford-upon-Avon branch - means a foreign branch of England.pl Sp. z o.o. in the UK. Headquarters at 35 Baker Avenue, Stratford-upon-Avon, Warwickshire, CV37 9PW, United Kingdom.

•England.pl Ltd - means the company England.pl Ltd established in accordance with the laws of England and Wales. Headquarters at: Quantum House, 6 Shottery Brook Office Park, Timothy's Bridge Road, Stratford-upon-Avon, Warwickshire, CV37 9NR, United Kingdom. Registered in Companies House, number 06776982, in HMRC as Money Service Business under number 12255373 and regulated by the British Financial Conduct Authority (FCA). The number in the FCA register is 524126.

•FX City - is a commercial brand operated by England.pl Sp. z o.o.

•The FX City trading system – refers to the FX City transaction system, run on the website [www.fxcity.eu](http://www.fxcity.eu), by means of which the money transfer service is provided.

•Terms and Conditions – means Terms of Use of the FX City website as available on the [website](#) and in the Client Portal.

•Client/User – means the Client of England.pl, who has registered in FxCity's transaction system creating a Client Portal in accordance with the Terms of Service. It also means a natural person or legal person who has registered with FX City using an online registration form to use the Service, and to which the person or company he or she represents has been assigned a unique Customer number.

•Client Portal - an individual transactional and administrative panel created by the Client on FxCity servers, used to execute transactions by the Client, view transaction history and manage own personal data. Login to the panel is done using security information.

•Legally legitimate purposes - those used by England.pl and entities cooperating with England.pl, under cooperation agreements, financial security measures and obligations resulting from them, including the transfer of personal data to the relevant state authorities.

## General provisions

•1. The following provisions constitute a privacy policy (hereinafter: „Privacy Policy”), which defines information regarding the collection and processing of Users' personal data as part of the services provided by England.pl Sp. z o.o.

•2. Acceptance of the Privacy Policy and Terms and Conditions is synonymous to consent to the collection, processing and transfer or sharing of personal data in the manner specified in this Privacy Policy.

## Basic information and contact details

•1. The administrator of personal data is: England.pl Sp. z o.o. with headquarters in Koszalin, ul. Marszałka Józefa Piłsudskiego 45, 75-502 Koszalin; KRS: 0000362067, NIP: 6692501424

•You can contact us using:

•• e-mail address: [office@fxcity.com](mailto:office@fxcity.com)

•• by phone: +48 94 343 58 14 or +48 500 308 968

•In matters related to the protection of personal data, you can contact our Data Protection Supervisor – Michal Danes, directly: [iod@england.pl](mailto:iod@england.pl)

•2. All data provided to England.pl will be processed in accordance with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of individuals with regard to the processing of personal data and on the free movement of such data and repeal of the Directive 95/46 / EC (general regulation on data protection).

•3. Respecting the Customer's rights and respecting the EU Data Protection Regulation, we set out to maintain the security and confidentiality of any personal data obtained. All England.pl employees have been properly trained in the processing of personal data.

## The scope and purpose of data processing

•1. England.pl ensures transparency in the scope of collected data and the manner of their use. To this end, England.pl informs about the scope and purpose of data processing.

•2. England.pl processes Clients' personal data in order to perform the contract to the extent necessary, in order to provide the money transfer service provided by FxCity. If the customer does not consent to the processing of data for this purpose and scope, we will not be able to provide the service.

•Data entered by the Client is the data consciously and voluntarily provided directly to England.pl by the Client during their registration and Client Portal creation, including: first name, surname, e-mail address, telephone number, address, citizenship, PESEL number or date of birth, place of birth, number and series of the identity document, recipient's bank account number, IP address when registering, data contained in copies of documents confirming the Client's identity.

•The Client is responsible for the accurateness of the provided personal data. The client has a responsibility to amend and update data provided during registration.

•The transaction recipient data is the data required to complete the transaction for a specific recipient, ie: name, surname, address, bank name and account number.

•The purpose of the contract is to provide the Customer with a money transfer service, including:

- registration of the Client Portal in the FxCity transaction system,

- obtaining sender's and recipient's data to fulfill the transaction,

- transferring the necessary data to the bank in order to carry out the transaction,

- verification of customer data based on the documents provided,

- transfer of customer data to specialized and credible institutions and service providers, counteracting financial crimes, as part of financial security measures applied,

- data storage for a period of 5 years from the end of the provision of services as specified by the law.

•Verification of data using copies of documents provided by the Client takes place in accordance with the legal obligation of England.pl to apply appropriate financial security measures (Article 34 paragraph 4, of the 1 March 2018 Act on Counteracting Money Laundering and Terrorism Financing (Journal of Laws 2018 No. 723, item 1075)).

•3. England.pl also processes Clients' personal data for marketing purposes, which consists of:

- Receiving marketing and commercial information - sending of England.pl marketing and trade information through e-mail and direct message within the Client Portal, including new offers, services, promotions, contests. Processing in this area requires the appropriate consent of the Client, which can be withdrawn at any time without affecting the provision of the main service.

- Processing of personal data for the purpose of transferring marketing and commercial information of England.pl's partners – processing of the name, e-mail address and phone number of the Client to send marketing and commercial information from England.pl's partners, including information on offers, services, promotions, competitions from England.pl partners. Processing in this area requires the appropriate consent of the Client, which can be withdrawn at any time without affecting the provision of the main service.

•4. Operational data - England.pl processes the unique number given to the Client during the registration of the Client Portal, and other data characterizing the manner in which the service is used, i.e. information on connecting the Client's end device to FX City's system, including: computer information and logging in, system logs containing the date, time of visit, the scope of using the services and the IP number of the computer from which the visit was made.

•5. Communication – in order to communicate with the Client, England.pl may make telephone calls and send, collect and store correspondence with them via system messages, e-mails, SMS messages or messages sent by traditional mail. Correspondence with the client and telephone connections are used to provide technical

support, answer Client's questions, provide information, handle complaints or other activities strictly related to the service provided.

## Use of personal data

- In addition to the processing of personal data for the purposes described, England.pl may use Client data:
  - to develop new functionalities as part of the services provided, as well as to improve the existing ones
  - to create new services,
  - to protect the rights of England.pl,
  - if it is necessary to fulfil the legitimate purposes pursued by England.pl or recipients of the data, and the processing does not violate the rights and freedoms of the data subject.

## Processing time

1. Client's personal data necessary for the provision of services will be processed during the period of contract performance and after the provision of services for a period of 5 years under the legal obligation imposed on England.pl (Article 49 of the 1st March 2018 Act on counteracting money laundering and financing of terrorism (Journal of Laws of 2018, No. 723, item 1075)). The processing of data after the termination of the provision of services is limited only to the required legal storage and sharing at the request of authorized state authorities. After the indicated time, client's personal data will be permanently deleted or made anonymous.
2. The client's personal data will be processed for marketing purposes until the appropriate consent is withdrawn or until the opposition is declared, for the period of contract performance for the provision of payment services, and after its termination, however, no longer than 5 years from the last activity in FX City's transaction system or in England.pl's marketing campaign organized outside of the transaction system. Client's activity means the execution of a transaction order in the transaction system or any action outside of the transaction system that may indicate client's interest in England.pl services or marketing campaigns, e.g. participation in a marketing campaign (conference, training, satisfaction survey). After the indicated time, client's personal data will be permanently deleted or made anonymous.

## Sharing and transfer of personal data

1. Customers' personal data may be provided by England.pl to the following categories of recipients:
  - persons authorized by England.pl - employees and associates,
  - entities to which England.pl has entrusted activities related to the processing of data - entities helping FxCity in the delivery of the service, hosting service providers, other entities with whom England.pl has entered into cooperation agreements and contracts for entrusting data processing,
  - other recipients - banks from which transfers are made and specialist institutions and service providers counteracting financial crimes in accordance with financial security measures adopted by England.pl,
  - England.pl's partners for marketing purposes, only with the consent of the Client.
2. Clients' personal data may be made available on request only to state authorities, local government bodies and authorized public institutions, only in connection with proceedings conducted by them and under applicable laws or other institutions who have an appropriate legal basis for such requests.
3. Clients' personal data will not be shared with other third parties, unless:
  - Disclosure of personal data serves the purpose of protecting England.pl's rights or resolving disputes,
  - The Client consented to the disclosure of personal data to a third party.

## Changes to the Client's personal data

• In the event of a change in personal data (e.g., name, address or phone number), the Client is responsible to update their data without delay by contacting the Customer Service Office. England.pl is not liable for any losses arising as a result of Client's failure to update their personal data.

## Client's rights with regards to personal data

•The Client has the right to:

- 1. Require access to your personal data, rectification, processing restrictions, transfer to another data controller and deletion if it is not contrary to applicable law. Requests can be submitted to the following e-mail address: [iod@england.pl](mailto:iod@england.pl).
- 2. Oppose the processing of your personal data for marketing purposes. Opposition can be reported to the following e-mail address: [iod@england.pl](mailto:iod@england.pl).
- 3. Withdraw any consent, at any time by submitting your request in the Client's Portal or directly to the following e-mail address: [iod@england.pl](mailto:iod@england.pl). Withdrawal of consent does not affect the compliance of processing of your personal data, which was made on the basis of consent before its withdrawal.

NOTE:

Withdrawal of consent for processing of data for the purpose of executing the contract will cause the termination of service provision by FxCity. Once withdrawal of consent for data processing in order to perform the contract has been given, the Client's data will be archived and stored for the period required by generally applicable law.

Withdrawal of any consent for the processing of data for marketing purposes will result in termination of data processing in this respect.

- 4. File a complaint to the President of Personal Data Protection Office in matters related to the processing of your personal data by England.pl.

## Security

•The website [www.fxcity.com](http://www.fxcity.com) and [www.fxcity.pl](http://www.fxcity.pl) contains links to websites of other entities. England.pl declares that it is not responsible for the procedures related to the privacy policy of these entities websites. These websites are provided for information purposes only, and the Client can use them voluntarily. This privacy policy statement applies only to the website [www.fxcity.com](http://www.fxcity.com) and the services provided by England.pl.

## Security

- 1. England.pl uses technical and organizational measures aimed at ensuring the best possible protection of processed personal data of Clients against unauthorized access, improper use and disclosure.
- 2. The technical measures used are modernized with the development of new technologies, needs as well as available security methods. The transmission of personal data is secured using Secure Socket Layer (SSL) technology with 128-bit coding and certified with the Geo Trust seal.
- 3. The organizational measures applied ensure that within the England.pl structure, only the persons authorized by England.pl have access to Client's personal data. All employees and collaborators who process personal data are authorized to do so and receive appropriate training.
- 4. England.pl regularly checks the compliance of its activities with the applicable law and updates the Privacy Policy.
- 5. England.pl cooperates with state institutions responsible for controlling the collection and processing of personal data and implements their recommendations every time.
- 6. Personal data in the possession of England.pl is not made available to third parties other than those mentioned in the Privacy Policy. Personal data held by England.pl is not sold to any entities.
- 7. A high standard of security may be effective only if good practices are applied by the clients. Under no circumstances may the Clients share their Client Portal data with unauthorized persons.

## Changes to the Privacy Policy

•The development of technology means that the Privacy Policy may undergo changes, which England.pl will inform its Clients about. The User will be informed immediately about any upcoming changes to this Privacy Policy.