GT INVESMENT SERVICES LTD

PRIVACY POLICY

Last Updated September 2026

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1. INTRODUCTION

GT Investment Services Ltd (hereafter the "Company", "we" or "us"), operating under the trade name fxgt.eu, is an Investment Firm incorporated and registered under the laws of the Republic of Cyprus with the registration number HE 389575. The Company is regulated by the Cyprus Securities and Exchange Commission (CySEC) under license number 382/20.

This Privacy Policy ("Policy") is designed to help you understand how we collect, use, disclose, and safeguard your data. We believe in transparency and we want you to know exactly how your information is being handled when you interact with our services.

2. IMPORTANT INFORMATION AND WHO WE ARE

2.1. Purpose of this Privacy Notice

This Privacy Notice aims to provide information on how the Company collects and processes your personal data through your use of its website www.fxgt.eu, including any data you may provide when signing up on the website.

The Personal Data collected by the Company might include, but not limited to:

- Personal information you provide to us on applications and other forms, such as your name, surname, address, e-mail address, phone number, date of birth, gender, occupation and employment details;
- IP address
- Profession and employment details
- Financial information such as your income, assets and net worth;
- Knowledge and experience in trading, risk tolerance and risk profile
- Bank account, e-wallets and credit card details, tax information
- Documents that you provide to us to verify your identity, such as your passport/identity card, utility bills and/or bank statement or your company incorporation details.

This website is not intended for children, and we do not knowingly collect data relating to children.

Before using our website, products, or services, we encourage you to read and fully understand the contents of this policy. By accessing or utilizing our services, you acknowledge that you have read and agree to the practices outlined herein. If you do not agree with this Privacy Policy, please refrain from using our services and products. When registering an account with the Company and using our

investment services and products, we are legally required to collect and process your personal data to deliver these services. By accepting this Policy, you consent to the collection and processing of your personal data as described in this document.

This Privacy Policy may be updated periodically to reflect changes in our data handling practices and compliance with regulatory requirements. We recommend reviewing this policy regularly to stay informed about any updates.

2.2. Controller

The Company is the controller and responsible for your personal data.

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

2.3. Contact Details

GT Investment Services Ltd

Registered address: Aiolou & Panagioti Diomidous, 9 Katholiki, 3020, Limassol, Cyprus

Business address: 17 Iapetou, Ground Floor, 4101 Agios Athanasios, Limassol, Cyprus

Telephone number: +357 25354107

Email: info@fxgt.eu

Website: www.fxgt.eu

2.4. Third-Party Links

This website may include links to third-party websites, plug-ins and applications. Clicking on those links or enabling those connections may allow third parties to collect or share data about you. We do not control these third-party websites and are not responsible for their privacy statements. When you leave our website, we encourage you to read the privacy notice of every website you visit.

3. THE DATA WE COLLECT ABOUT YOU

Personal data, or personal information, means any information about an individual from which that person can be identified. It does not include data where the identity has been removed (anonymous data).

We may collect, use, store and transfer different kinds of personal data about you which we have grouped together follows:

- **Identity Data** includes first name, maiden name, last name, username or similar identifier, marital status, title, date of birth and gender.
- **Contact Data** includes billing address, delivery address, email address and telephone numbers.
- **Financial Data** includes bank account and payment card details.

- **Transaction Data** includes details about payments to and from you.
- **Technical Data** includes internet protocol (IP) address, your login data, browser type and version, time zone setting and location, browser plug-in 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, 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 also collect, use and share **Aggregated Data** such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data but is not considered personal data in law as this data does **not** directly or indirectly reveal your identity. For example, we may aggregate your Usage Data to calculate the percentage of users accessing a specific website feature. However, if we combine or connect Aggregated Data with your personal data so that it can directly or indirectly identify you, we treat the combined data as personal data which will be used in accordance with this privacy notice.

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.

3.1. If you fail to provide Personal Data

Where we need to collect personal data by law, or under the terms of a contract we have with you and you fail to provide that data when requested, we may not be able to perform the contract we have or are trying to enter into with you (for example, to provide you with goods or services). In this case, we may have to cancel a product or service you have with us, but we will notify you if this is the case at the time.

4. HOW IS YOUR PERSONAL DATA COLLECTED

We use different methods to collect data from and about you including through:

- **Direct interactions.** You may give us your personal data by filling in forms or by corresponding with us by post, phone, email or otherwise. This includes personal data you provide when you:
  - apply for our products or services;
  - create an account on our website;
  - subscribe to our service or publications;
  - request marketing to be sent to you;
  - enter a competition, promotion or survey; or
  - give us some feedback.
- **Automated technologies or interactions.** As you interact with our website, we may automatically

collect Technical Data about your equipment, browsing actions and patterns. We collect this personal data by using cookies, server logs and other similar technologies. We may also receive Technical Data about you if you visit other websites employing our cookies.

- **Third parties or publicly available sources.** We may receive personal data about you from various third parties and public sources such as Technical Data from analytics providers such as Google based outside the EU.

5. HOW WE USE YOUR PERSONAL DATA

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.

Generally, we do not rely on consent as a legal basis for processing your personal data other than in relation to sending third party direct marketing communications to you via email or text message. You have the right to withdraw consent to marketing at any time by contacting us at the following email: info@fxgt.eu

5.1. Purposes for which we will use your Personal Data

We have set out below, in a table format, a description of all the ways we plan to use your personal data, and which of the legal bases we rely on to do so. We have also identified what our legitimate interests are where appropriate.

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 at info@fxgt.eu 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 in the table below.

Purpose/Activity	**Type of data**	**Lawful basis for processing including basis of legitimate interest**
To register you as a new customer	(a) Identity (b) Contact details (c) Proof of address document (d) Financial Profile (e) Economic Profile	Performance of a contract with you
To process and deliver your order including: (a) Manage payments, fees and	(a) Identity (b) Contact details (c) Proof of address document (d) Financial Profile (e) Economic Profile	(a) Performance of a contract with you (b) Necessary for our legitimate interests (to recover debts due to us)

Purpose/Activity	Type of data	Lawful basis for processing including basis of legitimate interest
charges (b) Collect and recover money owed to us	(f) Transaction (g) Marketing and Communications	
To manage our relationship with you which will include: (a) Notifying you about changes to our terms or privacy policy (b) Asking you to leave a review or take a survey	(a) Identity (b) Contact details (c) Proof of address document (d) Financial Profile (e) Economic Profile (f) Transaction (g) Marketing and Communications	(a) Performance of a contract with you (b) Necessary to comply with a legal obligation (c) Necessary for our legitimate interests (to keep our records updated and to study how customers use our products/services)
To administer and protect our business and this website (including troubleshooting, data analysis, testing, system maintenance, support, reporting and hosting of data)	(a) Identity (b) Contact details (c) Technical	(a) 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 reorganisation or group restructuring exercise) (b) Necessary to comply with a legal obligation
To deliver relevant website content and advertisements to you and measure or understand the effectiveness of the advertising we serve to you	(a) Identity (b) Contact details (c) Profile (d) Usage (e) Marketing and Communications (f) Technical	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)
To use data analytics to improve our website, products/services, marketing, customer relationships and experiences	(a) Technical (b) Usage	Necessary for our legitimate interests (to define types of customers for our products and services, to keep our website updated and relevant, to develop our business and to inform our marketing strategy)
To make suggestions and recommendations to you about goods or services that may be of interest to you	(a) Identity (b) Contact details (c) Technical (d) Usage (e) Profile	Necessary for our legitimate interests (to develop our products/services and grow our business)

5.2. Marketing

We strive to provide you with choices regarding certain personal data uses, particularly around marketing and advertising.

5.3. Promotional Offers from us

We may use your Identity, Contact, Technical, Usage and Profile Data to form a view on what we think you may want or need, or what may be of interest to you. This is how we decide which products, services and offers may be relevant for you (we call this marketing).

You will receive marketing communications from us if you have requested information from us or purchased services from us or if you provided us with your details when you entered our website for the purpose of receiving information and, in each case, you have not opted out of receiving that marketing.

5.4. Third-Party Marketing

We will get your express opt-in consent before we share your personal data with any company for marketing purposes.

5.5. Opting Out

You can ask us or third parties to stop sending you marketing messages at any time by logging into the website and checking or unchecking relevant boxes to adjust your marketing preferences or by following the opt-out links on any marketing message sent to you or by Contacting us at any time at the following email address: info@fxgt.eu

5.6. Cookies

You can set your browser to refuse all or some browser cookies, or to alert you when websites set or access cookies. If you disable or refuse cookies, please note that some parts of this website may become inaccessible or not function properly. For more information about the cookies we use, please see our Cookies Policy.

5.7. Change of Purpose

We will only use your personal data for the purposes for which we collected it, unless we reasonably consider that we need to use it for another reason and that reason is compatible with the original purpose. If you wish to get an explanation as to how the processing for the new purpose is compatible with the original purpose, please contact us at the following email: info@fxgt.eu

If we need to use your personal data for an unrelated purpose, we will notify you and we will explain the legal basis which allows us to do so.

Please note that we may process your personal data without your knowledge or consent, in compliance with the above rules, where this is required or permitted by law.

6. DISCLOSURES OF YOUR PERSONAL DATA

We may have to share your personal data with third parties for the purpose of carrying out our services

but should this be the case we check the issue.

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.

7. INTERNATIONAL TRANSFERS

We might need on certain occasions for the purpose of carrying out our services to transfer your personal data outside the European Economic Area (EEA).

Whenever we transfer your personal data out of the EEA, we ensure a similar degree of protection is afforded to it by ensuring at least one of the following safeguards is implemented:

- We will only transfer your personal data to countries that have been deemed to provide an adequate level of protection for personal data by the European Commission.
- Where we use certain service providers, we may use specific contracts approved by the European Commission which give personal data the same protection it has in Europe.
- Where we use providers based in the US, we may transfer data to them if they are part of the Privacy Shield which requires them to provide similar protection to personal data shared between the Europe and the US.

Please contact us at info@fxgt.eu if you want further information on the specific mechanism used by us when transferring your personal data out of the EEA.

8. 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.

9. DATA PROTECTION

9.1. How long will you use my Personal Data for?

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.

By law we have to keep basic information about our customers (including Contact, Identity, Financial

and Transaction Data) for five years after they cease being customers for regulatory purposes.

In some circumstances you can ask us to delete your data: see ***Request erasure*** below for further information.

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.

10. YOUR LEGAL RIGHTS

At any point while we are in possession of or processing your personal data, you, the data subject, have the following rights:

- **Right of access** to your personal data (commonly known as a "data subject access request"). This enables you to receive a copy of the personal data we hold about you and to check that we are lawfully processing it.
- **Right of rectification** 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.
- **Right to be forgotten**. 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.
- **Right to object of processing** your personal data. Right to object: You have the right to object on grounds relating to your particular situation, to certain types of processing such as direct marketing or 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. 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.
- **Right of portability.** You may ask us to provide you with your personal data in a structured commonly used and machine-readable format and have the right to transmit those data to another controller without our hindrance, when certain conditions are met. 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.

- **Right to 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 these rights, please contact us at info@fxgt.eu

Please note that if you request the erasure of your personal information:

- We may retain some of your personal information as necessary for our legitimate business interests, such as fraud detection and prevention and enhancing safety.
- We may retain and use your personal information to the extent necessary to comply with our legal obligations. Please note that we are legally obliged to keep on record all and any information that pertains to the provision of investment services to you and which is necessary to fulfill our obligations under the applicable laws for a period of up to 7 years after account closure.

You have the right to make a complaint at any time to the Cyprus Data Protection Commissioner if you feel that the Company has not responded to your requests to solve a problem. You may find their contact details here: http://www.dataprotection.gov.cy

11. WHAT WE MAY NEED FROM YOU

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.

12. RESPONSE TIMEFRAME FOR REQUESTS

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. ENQUIRIES

Should you have any enquiries about this Policy or any questions about the use of your personal information or you would like to raise a complaint, please contact us using the details set out below:

Email: info@fxgt.eu

Tel: +357 25354107

Postal address:17 Iapetou, Ground Floor, 4101 Agios Athanasios, Limassol, Cyprus