PRIVACY POLICY

Contents

Privacy Policy

FX NETWORK, INC.

Effective date / Last updated: 16 June 2026

This Privacy Policy explains how FX NETWORK, INC. (the "Company," "we," "us," "our") collects, uses, shares and protects personal data when you use our website at https://fxholding.com, our applications and our related services (together, the "Platform"), including the Club Membership, the FXTrade Investment Deposit and the Affiliate Programme. It should be read together with our Terms and Conditions (https://cdn.fxholding.com/pdf/TERMS_AND_CONDITIONS.pdf). Capitalised terms not defined here have the meaning given in the Terms.

By using the Platform you acknowledge this Policy. Where the law requires consent (for example, for certain marketing or cookies), we ask for it separately.

1. Who we are (Data Controller)

FX NETWORK, INC., a corporation organised under the laws of the Republic of Panama (Folio No. 155783603), is the controller of your personal data. Contact details are in Section 16.

2. The personal data we collect

We collect the following categories of personal data:

2.1. **Account and profile data** — name, username/nickname, email address, password (stored hashed), country and language preferences, and any profile details you provide.

2.2. **Identity verification (KYC) data** — we do not require identity verification from all users. Where we identify an account as higher-risk, suspect fraud, sanctions or money-laundering concerns, or are otherwise required by law, we may request government-issued identity documents, date of birth, nationality, photograph/selfie, proof of address, and information about your source of funds. This may include data treated as sensitive in some jurisdictions; we collect it only for legal-compliance and fraud-prevention purposes (Section 4.3).

2.3. **Financial and transaction data** — your Platform balance and transaction history, deposits and withdrawals, membership and deposit purchases, daily rewards, commissions and other credits, fees, and the cryptocurrency wallet addresses and on-chain transaction identifiers you use to fund or withdraw. All payments are made in cryptocurrency on public blockchains through our own on-chain solution; we do not accept or process bank, card or other fiat payments.

2.4. **Affiliate and network data** — your Referral Link/code, your sponsor and your referral organisation (upline/downline relationships), placement in the referral and binary structures, rank, turnover, and commission calculations.

2.5. **Communications data** — messages you send us (e.g. support emails to office@fxholding.com), and, where you link it, your Telegram account identifier/handle so we can deliver notifications.

2.6. **Technical and usage data** — IP address, approximate location derived from it, device and browser type, operating system, identifiers, log data, pages viewed, and actions taken on the Platform.

2.7. **Cookies and similar technologies** — see Section 8.

3. How we collect data

We collect data: (a) directly from you (registration, KYC, purchases, communications, linking Telegram); (b) automatically as you use the Platform (technical/usage data, cookies); and (c) from third parties (blockchain networks and infrastructure providers, identity-verification and anti-fraud providers, and the affiliate who referred you, to the extent they pass on your contact details).

4. Why we use your data and our legal bases

We use personal data for the purposes below. Where the EU/UK GDPR or a similar law applies, our legal basis is shown in brackets.

4.1. **To provide the Services** — create and operate your Account, process purchases, credit daily rewards and commissions, enable withdrawals, and operate the Affiliate Programme. *(Performance of a contract.)*

4.2. **To calculate and pay rewards** — compute daily rewards, referral commissions, ranks, caps and limits, and maintain the referral/binary network. *(Performance of a contract; legitimate interests in operating the programme accurately.)*

4.3. **To verify identity and prevent financial crime** — sanctions screening, anti-money-laundering and counter-terrorist-financing checks, source-of-funds review, and fraud detection. Identity verification is **risk-based**: we request KYC documents only from accounts we identify as higher-risk or suspect of abuse, or where required by law, rather than from every user. *(Compliance with a legal obligation; legitimate interests in preventing fraud and abuse.)*

4.4. **To communicate with you** — service messages, transaction and security notifications (including via Telegram and email where enabled), and responses to your enquiries. *(Performance of a contract; legitimate interests.)*

4.5. **For marketing** — to send promotional messages about the Platform where you have opted in or where otherwise permitted by law; you can opt out at any time (Section 10). *(Consent, or legitimate interests where permitted.)*

4.6. **To secure and improve the Platform** — monitoring, troubleshooting, analytics, and protecting the security and integrity of the Platform and our users. *(Legitimate interests.)*

4.7. **To comply with law and enforce our Terms** — to meet legal, regulatory, tax and accounting obligations, respond to lawful requests, and establish, exercise or defend legal claims. *(Legal obligation; legitimate interests.)*

5. Automated processing

The Platform calculates rewards, commissions, ranks and earning caps automatically from your activity and your network, and runs automated anti-fraud and sanctions checks. These processes follow the fixed rules described in the Terms; they do not produce legal or similarly significant effects about you based solely on automated processing without human involvement, other than (where applicable) automated sanctions/fraud screening that may pause or block a transaction pending review. You may contact us to request human review of any such decision.

6. Marketing and notifications

6.1. We send **service and transaction notifications** as part of operating your Account; these are not marketing and you cannot opt out of essential ones while you hold an Account.

6.2. **Telegram notifications** are delivered only if you link your Telegram account; you can unlink at any time to stop them.

6.3. **Marketing messages** are sent only with your consent or where permitted by law. You can withdraw consent or unsubscribe at any time via the unsubscribe link or by emailing office@fxholding.com.

7. When we share your data

We do not sell your personal data. We share it only as follows:

7.1. **Service providers (processors)** acting on our instructions — hosting and cloud infrastructure, blockchain infrastructure and node providers, identity-verification/KYC and anti-fraud providers, communications providers (email and Telegram delivery), and analytics providers.

7.2. **Within the affiliate network, on a limited basis** — to operate the Affiliate Programme, limited data (such as your username/nickname and that you joined, and aggregated network/turnover figures) may be visible to your upline as needed to calculate and display the programme. We do not share your KYC documents, contact details or financial-account details with other affiliates.

7.3. **Authorities and advisers** — regulators, law-enforcement, tax authorities, auditors and legal advisers, where required by law or to protect our rights.

7.4. **Corporate transactions** — a buyer or successor in connection with a merger, acquisition, financing or sale of assets, subject to this Policy.

8. Cookies and similar technologies

We use cookies and similar technologies to operate the Platform (essential cookies), remember preferences, and measure usage. Where required, we ask for your consent to non-essential cookies and you can manage your choices through our cookie banner or your browser settings.

9. International transfers

The Company is based in Panama and uses service providers that may process data in other countries. Where we transfer personal data across borders, including from the EEA/UK, we use appropriate safeguards (such as standard contractual clauses) or another lawful transfer mechanism where required. You may contact us for more information.

10. How long we keep data

We keep personal data only as long as necessary for the purposes in this Policy, including the life of your Account and as needed afterwards to meet legal, regulatory, tax, accounting and anti-money-laundering record-keeping obligations (which, for KYC and transaction records, is typically several years after the relationship ends), and to establish or defend legal claims. When data is no longer needed, we delete or anonymise it.

11. How we protect data

We use technical and organisational measures to protect personal data, including encryption in transit, hashing of passwords, access controls, and monitoring. No system is completely secure; you are responsible for keeping your login credentials confidential and for using a strong, unique password (see the Terms).

12. Your rights

Subject to applicable law and to verification of your identity, you may have the right to: (a) access the personal data we hold about you; (b) correct inaccurate data; (c) request deletion; (d) restrict or object to certain processing, including direct marketing; (e) data portability; and (f) withdraw consent at any time (without affecting prior processing). Some rights are limited where we must retain data to meet legal obligations (for example, AML records) or to defend legal claims.

To exercise any right, email office@fxholding.com. We respond within the period required by applicable law. If you are in the EEA/UK or another region with a data-protection authority, you also have the right to lodge a complaint with your local supervisory authority, though we encourage you to contact us first.

13. Children

The Platform is not directed to, and may not be used by, anyone under 18 (or the age of majority where higher). We do not knowingly collect data from children; if we learn that we have, we will delete it.

14. Third-party links and services

The Platform may link to or integrate third-party services (including Telegram and blockchain explorers) that have their own privacy policies. We are not responsible for their practices; please review their policies.

15. Changes to this Policy

We may update this Policy from time to time. We will post the updated version at https://cdn.fxholding.com/pdf/PRIVACY_POLICY.pdf with a new "Last updated" date and, for material changes, provide reasonable notice. Continued use of the Platform after changes take effect constitutes acknowledgement of the updated Policy.

16. Contact

For privacy questions or to exercise your rights:

FX NETWORK, INC. Folio No. 155783603, Public Registry of Panama Registered office: Calle Bethania, Avenida Simón Bolívar, Edificio Edison Corporate Center, Torre A, Oficina 7E, Ciudad de Panamá, República de Panamá Resident Agent: Panama Legal Business (PANLEB) Email: office@fxholding.com Website: https://fxholding.com