

## INTRODUCTION

This policy covers the processing of personal data by Forex Early Warning, via our website. We are committed to protecting the privacy of your personal information whilst striving to provide the very best user experience. We want our website to be safe and enjoyable for everyone. Under the UK General Data Protection Regulation 2021 (GDPR), the Data Protection Act 2018 and related laws, we have a legal duty to protect the personal information we collect from you. GDPR says that 'personal data' is any information relating to a living individual who can be identified, either directly or indirectly, from that information. This could include your name, email address, postal address or telephone number, or information collected online and used to identify you.

## CONTACT DETAILS

If you have any comments, concerns or questions, including any requests to exercise your legal rights, please contact us at [hello@forexearlywarning.co](mailto:hello@forexearlywarning.co)

It would be very helpful for us if you could include your full name, your postcode, and the nature of your concern.

## WHAT DATA DO WE COLLECT AND HOW DO WE USE IT?

<b>Information you provide to us</b>	When you purchase a subscription from us we receive personal information about you which we use to provide these services. This consists of your name and email address. We will use this to provide you with access to our subscription, and will ensure we have a lawful basis for doing so, in accordance with the country in which you reside.
<b>Ordering a subscription from us</b>	If you order a subscription from us, you will need to provide certain personal details, including payment information, so the order can be fulfilled. This may be collected, for example, as part of the registration process or when creating an account. You will be directed to PayWhirl who we use for our subscription payments, they will collect this information from you and fulfil your order.
<b>Content you share with us</b>	When you choose to share comments, photos, videos and other content with us we may receive personal information about you, for example when you interact with us on social media, or request for support with your trading desktop set up.
<b>Information we collect automatically when you use our sites/services</b>	We may collect technical and/or behavioural information about your use of our websites or other content online, and the device(s) you use to access the services. For example, this information may include details about how you browse our website and the devices and technology you use to browse our website. This may also include unique online identifiers such as device ID, device type, IP address and approximate location at the time of browsing. Please see <b>What data is collected on our websites?</b> and our <a href="#">Cookies Policy</a> for further details about how we use this data and information on opting out.

**Information for analysis, reporting and research**

We also collect statistical and analytical data via Google Analytics about visits and activity on our sites, such as the pages viewed, how long for, and which links are followed. This helps us to improve the way we deliver content and the products and services offered to you. We also use this anonymised data to report on our performance

**Communicating with you during your subscription**

We use the information you provide us with, such as email, address, to send you communications, these are related to your existing subscription and will announce service updates, changes, new free education and seminars. You can update your marketing preferences at any time. If you would like to unsubscribe (or opt-out) of receiving these emails please click the links on the emails you receive or contact [hello@forexearlywarning.co](mailto:hello@forexearlywarning.co)

**WHAT LAWFUL BASES DO WE RELY ON FOR PROCESSING?**

In order to process your personal data, we must have a lawful reason for doing so. GDPR sets out six lawful bases under which organisations can collect, use and store personal data. We rely on four of the lawful bases:

**1. Necessary for the performance of a contract**

If you are our customer and a subscriber, we will process your personal data on the basis that it is necessary for us to provide our products and services to you.

**2. Consent**

In some instances, we rely on your specific consent to process your personal information. This is where you have actively agreed and 'opted-in', for example to receive marketing communications from us, and you have the right to withdraw your consent at any time.

**3. Compliance with laws**

We may have to process and share your personal data in order to comply with our legal obligations, or to protect our rights or the rights of others. For example, we are required to collect certain information from you when processing your subscription payment for tax or financial reporting reasons.

**4. Legitimate interests**

In some situations, we rely on our legitimate business interests in order to collect and use your personal data. In these situations, we have conducted a balancing test to carefully consider the impact of the processing on your interests, rights and freedoms. We will only undertake the processing if we are satisfied there is no negative impact on you. We rely on Legitimate Interests for the following activities:

- providing, maintaining, improving and developing our products and services;
- managing suppression and unsubscribe requests;
- analysing the use of our products and services;

- using aggregated, non – personally identifiable statistical and analysis data to identify usage trends, such as your visits and activity on our sites, and to determine the effectiveness of our website and educational contents;
- allowing you to comment on our sites, provide feedback or take a survey;
- dealing with queries and complaints;
- personalising your experience on our sites;
- identifying fraudulent behaviour and ensuring our websites and systems are secure; and
- building and enriching profiles of users based upon, for example, product selection and online behaviour.

If you object to our reliance on Legitimate Interests for any purpose please email [hello@forexearlywarning.co](mailto:hello@forexearlywarning.co)

## **WHO MAY WE SHARE YOUR DATA WITH?**

### **1. PayWhirl**

We use PayWhirl to perform certain functions on our behalf including fulfilling your payment and the management of your subscription account. To which you will have registered for. They will be responsible for processing your credit/debit card payments. They will have access to your personal information to perform their function but they cannot use it or disclose it for any other purpose unless you have specifically given them consent to do so.

Please see their privacy policy for further details via their website <https://paywhirl.com>

### **2. Auditing organisations and other professional advisors/companies**

In the unlikely event of tax audits or investigations we may need to share your personal data with any third party in order to meet our legal and regulatory obligations, including statutory or regulatory reporting or the detection or prevention of unlawful acts.

### **3. Social media**

Majority of our educational content and videos are available via sites such as YouTube. On these occasions, our websites interact directly with YouTube.

By using these services, users are agreeing to be bound by the YouTube Terms of Service, which can be found at <https://www.youtube.com/t/terms>.

## **WHAT DATA IS COLLECTED ON OUR WEBSITES?**

‘Cookies’ are small data files which are sent to your computer, mobile phone or other device so that the website can remember information about your browsing activity. We use cookies on our websites for a variety of purposes:

## **1. Information storage and access**

The storage of information, or access to information that is already stored, on your device such as advertising identifiers, device identifiers, cookies, and similar technologies.

## **2. Content selection, delivery, reporting**

The collection of information, and combination with previously collected information, to select and deliver content for you, and to measure the delivery and effectiveness of such content. This includes using previously collected information about what content was shown, how often or how long it was shown, when and where it was shown, and whether you took any action related to the content, including for example clicking on content. This does not include personalisation, which is the collection and processing of information about your use of this service to subsequently personalise content and/or advertising for you in other contexts, such as websites or apps, over time.

## **3. Measurement**

When you visit our site we may collect information about your use of the content, in order to measure, understand, and report on usage of the service and our website.

Please see our [Cookies Policy](#) via our website for more information.

## **STORAGE AND RETENTION OF DATA**

We do not hold or store your data, your details are accessed via our own use of PayWhirl who we have instructed to undertake and fulfil our subscription service.

## **DATA SECURITY**

We are committed to protecting the personal data we hold and keep your information secure by taking appropriate technical and organisational measures against its unauthorised or unlawful processing and against its accidental loss, destruction or damage.

Our websites will permit you to create an account. When this happens, you will be prompted to create a password. You are responsible for maintaining the confidentiality of your password, and you are responsible for any access to or use of your account by someone else that has obtained your password, whether or not such access or use has been authorized by you. You should notify us of any unauthorized use of your password or account. If you believe your account has been compromised, please contact us at [hello@forexearlywarning.co](mailto:hello@forexearlywarning.co)

## **INTERNATIONAL DATA TRANSFER**

We operate a global business, so your personal data may be processed in a country other than your country of residence. For example, if you are UK citizen you may find your data is processed by PayWhirl based outside the UK or EEA, such as in the United

States. See PayWhirl's privacy policy via their website <https://paywhirl.com> on how additional safeguards are put in place.

By using our website, products or services or by interacting with us in the ways described in this Privacy Notice, you consent to the transfer, storage and processing of your personal information outside your country of residence, including out of the EEA, in the circumstances set out in this Privacy Notice. If you do not want your information to be transferred in this way you should not use our subscription services.

## **SOCIAL MEDIA ACCOUNTS**

We operate accounts on different social media platforms. If you visit one of our social media accounts we can usually only see information stored in your public profile on the social media platform, when you are logged in to your profile, while visiting our social media account; although we may process data that you provide to us when you contact us (for example: if you create a post, or send us a private message via Facebook).

If you visit one of our social media accounts, the operator of the social media platform also processes your data, regardless of whether you yourself have a profile on the platform. The social media platform also provides us with anonymous usage statistics, which we use to improve user experience. We do not have access to the usage data that the operator of the social network collects to create these statistics. For information on the social media operators please see their privacy policies.

## **WEBSITE NOTIFICATIONS (POP UPS)**

We provide news and updates about our sites via push notification messages or 'pop-ups'. This is a free service. The notifications are only sent to you if you have clicked on a button to allow it (you may have accidentally selected to receive notifications).

We have no control over your subscription to notifications as it is controlled by your browser and device. We do not store any recognisable data about you or your device in connection with the push notification service.

## **PRIVACY RIGHTS – UK AND EU CONSUMERS**

You have the right to request:

- Access to the personal data we hold about you.
- The correction of your personal data when incorrect, out of date or incomplete is to be completed via your PayWhirl account.
- The deletion of your personal data.
- That we stop using your personal data for direct marketing if you object to it.
- That we stop any consent-based processing of your personal data after you withdraw that consent.
- The right to request a transfer of your data to another service provider.

### **Your right to withdraw consent**

Whenever you have given us your consent to use your personal data, you have the right to change your mind at any time and withdraw that consent.

### **Where we rely on our legitimate interest**

In cases where we are processing your personal data on the basis of our legitimate interest, you can ask us to stop for reasons connected to your individual situation. We must then do so unless we believe we have a legitimate overriding reason to continue processing your personal data.

### **Exercising your rights**

If you wish to exercise any of your rights please email [hello@forexearlywarning.co](mailto:hello@forexearlywarning.co)

It would be very helpful for us if you could include your full name and email when contacting us.