

## Privacy Policy

### A. Policy Statement

OANDA entities listed in the table below (“OANDA”, “we” and “us”) and our affiliates respect customer privacy and are committed to protecting it. The purpose of OANDA’s Privacy Policy is to explain OANDA’s privacy practices and how your personal data (“Personal Data”) is collected, used, disclosed and maintained by us. We will be the data controller of such Personal Data, which means we will decide about purposes and means of the processing of Personal Data, and will process your Personal Data in accordance with our Privacy Policy.

The OANDA entity which you requested to share your Personal Data with, should be deemed the controller of information collected within the scope of this notice (“data controller”). Each data controller is independently responsible for deciding how it processes Personal Data about you. On some occasions, more than one OANDA entity may process your Personal Data as independent controllers. OANDA group members and affiliates may also support OANDA in performing the services under the applicable terms of use or service.

List of OANDA entities covered by this Privacy Policy:

Country/territory	Entity (data controller)
United Kingdom	OANDA Europe Limited
USA	OANDA Corporation
USA	OANDA Business Information and Services Inc.
EEA	OANDA TMS Brokers S.A.
Australia	OANDA Australia Pty
Canada	OANDA (Canada) Corporation ULC
Singapore	OANDA Asia Pacific PTE. Ltd
BVI	OANDA Global Markets Limited
Japan	OANDA Japan Inc.

Malta	OANDA Labs Assessment Ltd.
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The use and/or purchase of any of our services is subject to the applicable terms, the use of our website is subject to our website Terms of Use, if applicable, (“terms”) and this Privacy Policy is incorporated into and forms part of those Terms..

A Data Protection Officer has been appointed at OANDA Group to ensure protection of your Personal Data, to act as a contact point with regard to all issues related to processing of your Personal Data and to help you to exercise your rights described in this Privacy Policy. In matters regarding the processing of Personal Data by us, you can contact us via the following email address: [privacy@oanda.com](mailto:privacy@oanda.com).

## **B. Personal Data OANDA Collects**

This Privacy Policy describes how OANDA collects and processes personal data through various online channels, including forms and questionnaires, for the purposes outlined below:

In order to provide materials and services to you, when you visit our website, register for events, request from us exclusive content or materials, newsletter, or information or offers in particular on our trading services or promotions, we will collect Personal Data from you. The following are examples of circumstances under which we may receive your Personal Data:

- submitting online forms (including contact forms),
- registering for events, requesting our services, or
- requesting exclusive content, materials, information, or offers.

We refer collectively to these interactions as “**Website Services**”.

We may collect standard internet log information including, device used, operating system, browser type, language, access times, and referring website addresses. To ensure that the website is well managed and to improve navigation, we or our service provider(s) may also use cookies (small text files stored in your browser) or web beacons (electronic images that allow us to count website users who have accessed particular content and to access certain cookies) to collect aggregated data such as statistical or demographic data for any purpose (“**Aggregated Data**”). Aggregated Data may be derived from your Personal Data but should not be considered Personal Data as this data does not directly or indirectly reveal your identity. For example, we may aggregate your data to carry out market research and statistical research. 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 and will use such data in accordance with this Privacy Policy.

OANDA does not collect more Personal Information than is required or necessary to provide Website Services to you and to comply with regulatory compliance and other legal obligations.

### *What Kind of Data We Collect*

We (or our processors, i.e. third parties acting on our behalf) may collect your Personal Data when providing the Website Services, including in particular:

- First Name
- Last Name
- Email
- Phone Number
- IP address
- Company name
- Device / System information

### **C. How And For What Purposes OANDA Uses Your Personal Data**

We may hold and retain your Personal Data for various purposes based on different reasons.

We collect and process your Personal Data to enable us to deliver the Website Services to you in accordance with our Terms of Service, if applicable, sometimes we are required by law and regulations to collect and process Personal Data, or when we have other legal bases for processing your Personal Data. At other times, we consider it is in our legitimate business interests to collect and process Personal Data, taking into consideration your privacy rights. We may use your Personal Data to:

- Respond to requests you make in connection with providing the Website Services. Without collecting your Personal Data, we may not be able to respond to your request.
- To provide you with a response pursuant to your other request, we will collect and use Personal Information including your name and email address. Without this information, we may not be able to deliver the content mentioned in the preceding sentence and to respond to your request.
- Provide our Website Services to you, including access to exclusive content or materials, newsletters, information or offers and promotions, events that you registered for.
- In order to perform the Website Services under the contract between you and OANDA (based on our Terms of Service, if applicable), we have to collect certain Information from you such as your name, last name and contact details such as email and phone number. Without this information, we may not be able to deliver the Website Services which you request from us.
- Improve and develop the Website Services. We look for ways to innovate and advance our Website Services. We will use information, which may include your Personal Data or Aggregated Data about how you use the Website Services, including how you interact with various aspects of the Website Services, the duration for which you use the Website Services and content that is of interest to you, in order to do this. It is in our legitimate business interests to use Personal Data in this way to develop improved Website Services.
- Send administrative information, changes to our Terms of Service, if applicable or Privacy Policy. When we make updates to our terms of service and privacy policies we are required under certain laws, to notify you of these changes. Other administrative communication may also be sent out in line with our legitimate business interests.
- Send marketing communications like product announcements, educational materials or upcoming online or offline events, where you have not objected to receiving these or with your consent where required. This may also include inviting you to participate in various promotional activities and consumer research surveys. It is one of our legitimate business interests to generate growth for our own business to ensure we continue to generate

development for our company and drive sales of our products and services. We will carry out marketing campaigns and research surveys in accordance with other applicable laws.

- Research and analyse how our Website Services are used via cookies, web beacons and other similar technologies to personalise the Website Services. (For more information about our use of cookies and your choices to opt-out of their use, see “Cookies” at section I below).
- We use your Personal Data in our legitimate business to understand how you interact with our Website Services and to deliver relevant content to you online.
- Diagnose and fix technical issues and monitor the security of our environments.
- We need to understand how our Website Services are performing in order to prevent and address any issues that may present themselves with regard to technical and security operations. We may process your Personal Data for this purpose as our legitimate business interests to protect the integrity of the Website Services.
- To comply with any applicable law, regulation, legal process, or governmental request.
- For any other purpose disclosed to you in connection with our Website Services from time to time.
- If we intend to process your Personal Data for a purpose other than that set out above, we will provide you with relevant information including legal basis for processing your Personal Data prior to such processing.
- It is also in our legitimate business interests to process your Personal Data to protect our rights or property, or the security or integrity of our Website Services.

**Third-Party Content.** The Website Services may offer access to third party services. These services may collect and use your Personal Data and are subject to separate terms of service. This Privacy Policy does not extend to third-party apps or add-ons (which may also collect your Information) even if packaged by OANDA or offered through the Website Services. Always read applicable terms of services and privacy policies before you start using these services.

We do not sell your Personal Data collected in connection with the Website Services.

#### **D. Disclosure Of Your Personal Data**

OANDA may disclose Personal Data to affiliated and non-affiliated third party entities in connection with our business (such entity may be located anywhere in the world, provided that these locations ensure adequate safeguards are in place for the transfer, as set out further in the section marked "Where do we store your Personal Data") including, without limitation:

- To OANDA’s service providers that perform services on OANDA’s behalf (processors) under written agreements which restrict use of Personal Data to the limited purposes determined by OANDA and obliges processors to refrain from further use or disclosure of Personal Data, except as permitted by law. This may include companies which perform data analysis, business intelligence, customer relationship platform providers, marketing support services providers, consumer research service providers, cloud service providers, and other IT service providers.
- To OANDA affiliates, which are permitted to disclose and use the Personal Data only to the extent that OANDA may disclose and use the information under this Privacy Policy.
- In the ordinary course of business to OANDA’s attorneys, accountants and auditors.
- To protect against actual or potential fraud, unauthorised transactions, claims or other liability.
- To government, regulatory or law enforcement agencies to the extent permitted or required by law, or to comply with other applicable legal requirements.

- To monitor our Website Services.
- To comply with civil, criminal or regulatory investigations, or judicial process, summons or warrant by appropriate EU or UK authorities or other authorities pursuant to applicable laws.
- In the event of a proposed or actual reorganisation, merger, sale, joint venture, assignment, transfer, or other disposition of all or any portion of OANDA's business, assets or stock (including in connection with any bankruptcy or similar proceedings).

The user confidentiality obligations set out in our Privacy Policy do not and will not apply to, and in respect of, any Personal Data required to be disclosed (by us or you) pursuant to any applicable law, or the lawful request of any court of competent jurisdiction, government agency, or regulatory body, provided in each case you (or we) notify and consult with us (or you) in advance and as to the timing and content of such disclosure, except where applicable law prohibits us (or you) from doing so.

Except as stated in this Privacy Policy, OANDA will not share Personal Data about any present or former user with any non-affiliated third party without the customer's prior written consent.

#### **E. How we secure your Personal Data**

All Personal Data and other information you provide to us is stored on secure servers and we implemented appropriate technical and organisational measures to ensure that the processing of the Personal Data is performed in accordance with the applicable laws. These servers are located in locations which ensure applying adequate safeguards to protect Personal Data in line with applicable laws and standards set out in this Privacy Policy.,

Unfortunately, the transmission of information via the Internet is not completely secure. Although we will do our best to protect your Personal Data, we cannot guarantee a complete security of your Personal Data transmitted to our Website Services and Platform; any transmission is at your own risk. Once we have received your Personal Data, we will use strict procedures and security features to keep your Personal Data confidential and try to prevent unauthorised access to this data.

#### **F. Where do we store your Personal Data**

The Personal Data that we process in relation to you may be transferred to, and stored at a destination outside of your country of residency that may not be subject to equivalent data protection law as may be applicable in your country of residency. It may also be processed by staff situated outside your country of residency who work for us, our affiliates or for one of our suppliers (processors).

For example, we may transfer your personal Data outside your place of residency:

- In order to implement data processing purposes outlined in Section C of this Privacy Policy. This includes provision of Website Services to you
- Where we are legally required to do so
- When you gave us your consent to do so
- In order to facilitate the operation of our group of businesses, where it is in our legitimate interests and we have concluded these are not overridden by your rights.

We only transfer your Personal Data outside your country of residency to countries which are considered to provide an adequate level of data protection, or in the absence of such legislation that

guarantee adequate protection of personal data, based on appropriate safeguards (e.g. standard contractual clauses adopted by the European Commission to the extent recognised by the competent Data Protection Authority or another statutory exemption) provided by local applicable law, including enforceable data subject rights and effective legal remedies for data subjects.

A list of the countries in which OANDA Group operates can be found [here](#).

#### **G. How long we retain your Personal Data for**

We will only retain Personal Data for as long as necessary to fulfil the purpose for which it was processed or to comply with legal, regulatory, or internal policy requirements. To help us do this, we apply criteria to determine the appropriate periods for retaining your Personal Data depending on the purpose of its processing. As far as necessary, we will keep your Personal Data for the duration of our business relationship, subject to applicable legal and regulatory requirements. In addition, we might process your Personal Data after the termination of our business relationship for compliance and risk management purposes in accordance with the applicable laws, as well as pursuant to various retention and documentation obligations or if it is in our legitimate interest, for example in order to defend against claims. For example, we retain Personal Data in relation to Website Services, for the minimum period of 12 months unless such data is likely to relate to a contract you may/have entered into in the future, and subject to any subject access or erasure requests you may make, and in relation to any Personal Data provided with your consent for research purposes, until such time when this Personal Data is no longer needed for the purpose for which it was first collected.

We may also process and retain Aggregated Data beyond time referred to in this G section of the Privacy Policy for research purposes and to help us develop and improve our services. You cannot be identified from Aggregated Data retained or used for these purposes.

#### **H. Your Data Subject Rights**

You have certain rights in relation to your Personal Data. Please be aware that certain exceptions apply to the exercise of these rights, so you will not be able to exercise these in all situations. OANDA exercises your rights without undue delay, generally, within one month of receiving the request at [privacy@oanda.com](mailto:privacy@oanda.com).

- You have a right to receive information about the processing of your Personal Data by OANDA. You have a right to access your own Personal Data.
- You have the right to request OANDA to correct your Personal Data that is incorrect, as well as to request to supplement or update incomplete or outdated Personal Data.
- You have the right to request OANDA to erase your Personal Data in any of the following cases: (i) when Personal Data is no longer necessary for the purposes for which it was collected or otherwise processed, (ii) when Personal Data is processed unlawfully, (iii) when Personal Data must be removed in order to fulfil the legal obligation set out in generally applicable regulations. However, OANDA will not be able to erase Personal Data to the extent that the processing of your Personal Data will be necessary for: (i) exercising the right to freedom of expression and information, (ii) compliance with a legal obligation that requires processing Personal Data on the basis of universally applicable regulations, (iii) statistical purposes on the terms set out in applicable laws, (iv) establishing, investigating or defending claims.

- You have the right to request OANDA to limit the processing of Personal Data in cases where: (i) you question the correctness of Personal Data - for a period allowing OANDA to check the correctness of this data, (ii) the processing is unlawful, and you oppose the deletion of Personal Data and request the restriction of its use instead, (iii) OANDA no longer needs your Personal Data for the purposes of processing set out in section C of this Privacy Policy, but you need them to establish, assert or defend claims.
- You have the right to ask if we transfer the Personal Data you gave us to another organisation, or to you, in certain circumstances.
- You have the right to object to the processing of your Personal Data if OANDA processes this data in a legitimate interest. We may disregard the objection, if we demonstrate the existence of valid, legitimate grounds for processing, overriding your interests, rights and freedoms, or if we process Personal Data for establishing, pursuing or defending claims.
- In the limited circumstances where you may have provided your consent to the processing of your Personal Data, you have the right to withdraw any consents to processing that you have given us, and prevent your Personal Data from further processing, if there is no other legal ground or purpose under which we can process your Personal Data.
- You have the right to complain to your local data protection authority (to your habitual residence, your place of work, or where the alleged infringement took place) in matters regarding processing your Personal Data by us.

## I. Cookies

Cookies are small text files placed in visitors' computer browsers to store their preferences. The Website Services, and our third party partners, collect and store information that is generated automatically as you use it, including your preferences and anonymous usage statistics.

OANDA collects information about your device and uses tracking mechanisms such as cookies to: (i) facilitate user's use of our website and mobile applications, (ii) enable customisation of our Website Services and website features, (iii) avoid user's re-entry of data, (iv) store user's preferences for certain kinds of information, (v) enhance security measures, and (vi) gather data about usage of our website and mobile applications for research and promotions.

OANDA uses cookies from third party service providers to facilitate website tracking and security measures and may share the information collected with these third parties acting as our service providers (processors), which are required to maintain the confidentiality of the information.

We use these cookies and other technologies on the basis that they are necessary for the performance of a contract with you, or because using them is in our legitimate interests (where we have considered that these are not overridden by your rights), and, in some cases, where required by law, or when you have consented to their use.

We use the following types of cookies:

- **Essential** cookies. These are cookies that are required for the operation of our Website Services and under our terms of service, if applicable.

- **Analytical/performance** cookies. They allow us to recognise and count the number of visitors to our website and to see how visitors move around our Website Services when they are using it. This helps us within our legitimate interests of improving the way our Website Services work, for example, by ensuring that users are finding what they are looking for easily.
- **Behavioural** cookies. These are used to recognise you when you return to our Website Services. This enables us, subject to your choices and preferences, to personalise our content and remember your preferences (for example, your choice of language or region).
- **Marketing** cookies. These enable you to experience more relevant online content and see adverts which are aligned with your interests, as indicated by your activity on our site.

You can accept or reject cookies, or customise your choices using "Cookie settings", you can also configure browser preferences to not accept these cookies however this may result in reduced functionality.

Some third-party vendors that provide ads on OANDA web pages may use cookies to collect details on customer website visits and other data (but not names, addresses, email addresses, or telephone numbers) in order to provide ads about goods and services of particular interest to individual customers. For more information on this practice or to opt out, please visit [www.aboutcookies.org](http://www.aboutcookies.org).

#### **J. Links to non-OANDA websites**

The OANDA website may provide links to third-party websites for user convenience and information. If users decide to access those links, they will leave the OANDA website. OANDA does not control those third-party sites or their privacy practices, which may differ from OANDA's. OANDA does not endorse or make any representations about third-party websites. Any Personal Data users choose to disclose to such third parties is not covered by OANDA's Privacy Policy. User should review the privacy policy of any third-party website before submitting their Personal Data. Some third-party companies may choose to share their Personal Data with OANDA. That sharing is governed by the disclosing company's privacy policy.

#### **K. Notification of Policy and Policy Changes**

OANDA provides an initial notice of its Privacy Policy to user at the time it establishes a relationship with OANDA, and the Privacy Policy is dated and continuously posted on OANDA website. Updates of the Privacy Policy will be posted on the OANDA website, so its users will always know what kind of information we collect, how and for what purposes we use it, and what rights they have.

#### **L. Contact Us:**

We will never ask you for security information such as passwords over the phone or by email. If you receive a call or email which you are not sure has come from OANDA, please contact us at [infosec@oanda.com](mailto:infosec@oanda.com).

We value our users and customers' opinions. If you have comments or questions about our Privacy Policy, you are invited to contact OANDA Group Data Protection Officer at [privacy@oanda.com](mailto:privacy@oanda.com).



Any concerns you may have regarding OANDA's Privacy Policy or specific complaints about how your Personal Data has been collected, processed or disclosed should be forwarded to OANDA Group Data Protection Officer via [privacy@oanda.com](mailto:privacy@oanda.com). OANDA will thoroughly investigate the complaint and will take whatever actions are warranted and notify you once this has been done.

If you remain unhappy with how we've used your Personal Data after raising a complaint with us, you can also file a complaint to the supervisory authority responsible for protecting data subjects' rights. For example you can find the list of the supervisory authorities operating in the EEA [here](#).

**Last Updated: February, 6 2025**