



PRIVACY STATEMENT



xopenhub.pro

X Open Hub Sp. z o.o., a Polish limited liability company, organized and existing under the law of Poland whose registered office is at ul. Ogrodowa 58, 00-876 Warsaw, entered into the register of entrepreneurs conducted by the District Court for the Capital City of Warsaw, XII Commercial Division of the National Court Register under registration number KRS: 0000454027, REGON: 146583356, Tax Identification Number (NIP) 5272691601, with a fully paid up share capital in the amount of PLN 5.000,00.

PRIVACY STATEMENT

GENERAL PROVISIONS

The purpose of this privacy policy is to provide you with details of how X Open Hub, a registered trading name of XTB Limited (“X Open Hub”, “we” or “us”) with the registered and trading office at Level 34, One Canada Square, Canary Wharf, E14 5AA, London, United Kingdom (company number 07227848), collects and uses information, including where applicable any personal data, supplied to us through the website <http://xopenhub.pro> (“Website”), and any telephone, chat or email communication that we may send you or your company. Please read this privacy policy carefully.

PROTECTION OF PERSONAL DATA

It is the stated policy of X Open Hub that we will act in accordance with current legislation and aim to meet current best practice with regard to the processing of personal data. This policy may be amended from time to time so please check it regularly. We understand the importance of maintaining the privacy of your personal information. By entrusting us with your information, we would like to assure you of our commitment to keeping it private. We have taken measurable steps to protect the confidentiality, security and integrity of your information. This statement should be read together with any additional terms and conditions, disclaimers or other contractual terms you have entered into with us, where applicable, as well as any applicable mandatory laws and regulations.

HOW DO WE PROTECT YOUR PERSONAL DATA?

The following measures are in place to safeguard your personal data:

1. access to your account is controlled by the password and username which are unique to you;
2. your personal data is stored on secure servers;
3. payment details are encrypted using Ingrain devices which provide tamper-resistant;
4. protection of cryptographic keys to ensure encrypted data is kept private and secure.

While we will use all reasonable efforts to safeguard personal data, you acknowledge that the use of the internet is not entirely secure and for this reason we cannot guarantee the security or integrity of any personal data transferred from you, or to you via the internet.

WHO IS THE CONTROLLER OF YOUR DATA?

When you send us your personal data, X Open Hub becomes their controller.

Access to your data is only granted to those employees or partners who require that information to provide support related to execution of your instructions connected with our products or services. We have implemented procedures connected with securing and using personal data.

HOW LONG DO WE STORE YOUR PERSONAL DATA?

We will not keep information for any longer than is required. In many cases, personal information must be kept for considerable periods of time. Retention periods will be determined taking into account the type of personal information that is collected and the purpose for which it is collected, considering the requirements applicable to the situation and the need to destroy outdated, unused information at the earliest reasonable time.

THE DATA WE COLLECT

We may collect data from you in a number of ways:

1. Whilst visiting the Website we may collect data from you in the following ways:
 - data submitted by you through website forms, such as the contact request form, or chat messages;
 - information on the pages you request, such as the time of visit, content requested, internet protocol address and other information that your browser may send to our web servers; and
 - through the use of cookies to identify you, your browser, browsing preferences and whether you visited the X Open Hub website from various content and/or promotional material we place on other websites or in email.
2. When we send or receive emails from you:
 - whether such emails are successfully delivered; and
 - when you receive, open or click on content in emails we may send; and any
 - subsequent visits you make to the Website.
3. When you call us or we call you:
 - the telephone number you are calling from;
 - the date time and content of any such call; and
 - we may record such telephone conversations.

We may also combine the data provided by or obtained from you, with information we may have collected or obtained from other sources, such as public records and bodies or private organisations.

RIGHTS IN CONNECTION WITH PROCESSING OF YOUR PERSONAL DATA

Under the Data Protection Act, you have the right to:

- 1) object to the using of data at any time;
- 2) restriction of data processing;
- 3) access, rectification and erasure of information about you;
- 4) data portability;
- 5) obtain a copy of any personal information which we hold about you and to advise us of any perceived inaccuracy. The Act does set out some exceptions to this. To make a request, please contact us, verifying your identity and specifying what information you require. We may charge a fee. You may contact us via e-mail data.privacy@xtb.co.uk or write to us at XTB Limited, Level 34, One Canada Square, Canary Wharf, London, E14 5AA, United Kingdom.

WHO DO WE SHARE YOUR PERSONAL DATA WITH?

Depending on the product or service concerned we may disclose data to:

1. service providers and specialist advisers to us who have been contracted to provide us with administrative, financial, research or other services (e.g. banks, investment companies, auditors, companies providing other financial services, IT companies, advisory or courier companies);
2. referring parties and introducing partners with whom we have a mutual relationship;
3. public authorities especially law enforcement authorities, enforcement authorities, fiscal control authorities, courts, public authority appointed to protect personal data;
4. proceeding or reference agencies;
5. anyone authorised by an individual, as specified by that individual or a contract.

LOCATION

The provision of services by X Open Hub may require the transfer of personal data to entities providing services to X Open Hub in other countries, including countries outside the European Economic Area. In the case of transfer to countries that do not provide adequate protection of personal data, X Open Hub applies safeguards in the form of standard data protection clauses adopted by the European Commission.

COOKIE FILES

X Open Hub uses cookie files to gather information.

You can access and browse the Website without disclosing personal information. When accessing the Website anonymously we use cookies to identify your browser, but this information is not personally identifiable. Cookies are small files of information, which often include a unique identification number or value, which are stored on your computer's hard drive as a result of you using the Website.

X Open Hub uses two main kinds of cookie files:

1. persistent cookies which are stored in your terminal equipment for the period of time defined in the parameters of the cookie files, or by the time they are deleted by you;
2. session cookies which are stored in your terminal equipment by the time of logging-out or closing the browser's window.

WHY DO WE USE COOKIES?

The purpose of this information is to provide you with a more relevant and effective experience on this Website, including presenting web pages according to your needs or preferences. We also use cookie files in order to examine your activity to create anonymous, aggregated statistics, which help us to understand in what way you use the internet websites, which contributes to the improvement of the structure and content of those sites as well as identification of the source, which you has used to enter our Website. Moreover, we use cookie files to maintain the session of the Website's user (after logging-in).



MANAGING BROWSER'S SETTINGS

In many cases the software which is used for viewing the internet websites implicitly allows the storage of cookie files in your terminal equipment. You may, at any time, change the settings regarding cookie files. Such settings may be changed, in particular, in such a way, so as to block the automatic processing of cookie files in the settings of the internet browser, or inform each time about their placing in your equipment. The detailed information about the possibility and ways of processing cookie files, including, the disabling, blocking and deleting cookie files, is available in the settings of the software for a concrete internet website.

However, please be aware that you may not be able to access some parts of Website if you choose to disable the cookie acceptance in your browser. We therefore recommend you enable cookie acceptance to benefit from all the services on the Website. Some of our business partners (e.g. advertisers) may use cookies on Website. We have no access to, or control over, these cookies. This privacy statement covers the use of cookies by Website only and does not cover the use of cookies by any third party.

You may find more information on cookies at the address: www.aboutcookies.org, or in section Help in the internet browser menu.

HOTJAR

We use [Hotjar](#) in order to better understand our users' needs and to optimize this service and experience.

Hotjar is a technology service that helps us better understand our users experience (e.g. how much time they spend on which pages, which links they choose to click, what users do and don't like, etc.) and this enables us to build and maintain our service with user feedback. Hotjar uses cookies and other technologies to collect data on our users' behavior and their devices (in particular device's IP address (captured and stored only in anonymized form), device screen size, device type (unique device identifiers), browser information, geographic location (country only), preferred language used to display our website). Hotjar stores this information in a pseudonymized user profile. Neither Hotjar nor we will ever use this information to identify individual users or to match it with further data on an individual user.

For further details, please see Hotjar's privacy policy by clicking on [this link](#).

You can opt-out to the creation of a user profile, Hotjar's storing of data about your usage of our site and Hotjar's use of tracking cookies on other websites by following this [opt-out link](#).

HOW DO WE USE YOUR DATA?

We will use information collected from you to provide the information and services requested by you and to improve the quality of our service. Unless you are informed otherwise, the personal information we hold is used for reviewing your ongoing needs, enhancing customer service and products, giving you ongoing information or opportunities that we believe may be relevant to you. We limit access of your data to only those employees or partners that need to know the information in order to assist in carrying out your request for products or services. We have procedures in place regarding how to safeguard and use non public personal information.

LINKS TO OTHER WEBSITES

Our Website contains links to websites operated by other parties. We provide the links for your convenience, but we do not review, control or monitor the privacy practices of websites operated by others, and this privacy policy does not apply to such third party websites. We are not responsible for the performance of websites operated by third parties or for your business dealings with them. We encourage you to read the content of privacy statements posted on third party websites, in particular if your personal data are collected through them.

HOW TO CONTACT US?

If you have any questions regarding this policy, wish to access or change your information or have a complaint, or if you have any questions about security on our Website, you may email us at data.privacy@xtb.co.uk.

CONSENT

By continuing to use the Website and through providing personal data to us, you consent to our use of your personal data as set out in this policy.