

Privacy Notice

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Wall Street Forex Global Pay (hereafter referred to as "we" or "our" or "us" or "WSFX") respects your right to privacy. In this Notice **"You"** refers to data subject (customers and website visitors) whose personal data is processed by WSFX.

This Privacy Notice explains who we are, how we collect, share, and use personal data about you, and how you can exercise your privacy rights. The details on what personal data will be processed and which method will be used depend significantly on the services applied for or agreed upon.

Definitions

Data Subject - A natural person whose personal data is processed by WSFX, or vendors contracted by WSFX.

Employee - Staff and outsourced staff of WSFX including external consultants or contractors.

Personal Data - Any information relating to a Data Subject who can be identified, directly or indirectly, by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that Data Subject.

Special Category of Personal Data - Any data that could potentially identify a specific individual's racial or ethnic origin, political opinions, religious or philosophical beliefs, membership of trade union, and the processing of genetic data, biometric data for the purpose of uniquely identifying a natural person, data concerning health or data concerning a natural person's sex life or sexual orientation. Hereafter 'personal data' and 'special category of personal data' are jointly referred as 'personal data'.

Processing - Any operation or set of operations which is performed on Personal Data or on sets of Personal Data, whether by automated means, such as collection, recording, organization, structuring, storage, adaptation or alteration, retrieval, consultation, use, disclosure by transmission, dissemination or otherwise making available, alignment or combination, restriction, erasure or destruction.

Person - Any individual other than the data subject.

Third Party - A natural or legal person, public authority, agency, or body other than the data subject, controller, processor and persons who, under the direct authority of the controller or processor, are authorized to process personal data.

Vendor- Processors contracted by WSFX.

If you have any questions or concerns about our processing of your personal data, then please contact us using the contact details provided.

Contact Details of Data Protection Officer (DPO) / Information Security Unit (ISU)

WSFX has its head office located in Mumbai, India. WSFX has appointed a DPO OR ISU for you to contact if you have any questions or concerns about the WSFX's personal data policies or practices.

Contact information is as follows:

Contact Person: - Chief Technology Officer

Address:- Unit 622, 6th Floor, The Summit Business Bay – Omkar, M.V. Road, Opp. PVR Cinema, Chakala Andheri (East), Mumbai - 400093.

Email:-infosec@wsfx.in

Phone: +91 2262709666

What does WSFX do?

WSFX – WSFx Global Pay Limited is a Reserve Bank of India (RBI) licensed, Authorized Dealer Category II Foreign Exchange House. WSFx Global Pay is headquartered in Mumbai and has a strategic branch network of 19 branches across key cities in India. WSFx Global Pay is listed with the Bombay Stock Exchange (BSE) and is a part of the Spice Connect group. WSFx Global Pay takes pride in being an ISO27001 certified company.

WSFx Global Pay is on a mission to transform the forex eco-space with its comprehensive and digital solutions designed to cater to forex requirements for travellers, students, agents and corporate.

For more information about WSFX, please visit our website at <https://www.wsfx.in/>

When do we collect your personal data?

Direct interactions

You may give us your identity, contact, financial data, and transaction data by filling in forms or by corresponding with us by post, phone, and email or otherwise. This includes sharing of personal data for the following purposes but not limited to:

- a. By registering accounts on our website including setting up passwords and preferred usernames, contact details, account details.
- b. Using our products or services.
- c. Subscribe to our service or publications or newsletters.
- d. Request marketing material notifications to be sent to you.
- e. Records of your interactions with us such as telephone conversations, emails, other correspondence, and your instructions to us.
- f. Providing your feedback.
- g. By filling in forms, for example when you sign up to offers, news or a contest or filling up a complain form on our website.
- h. By sending us emails and using our Chat Service.
- i. By interacting with us on social media platforms such as but not limited to Facebook, Twitter, Instagram, YouTube, LinkedIn.

Automated technologies or interactions

Log Files. Log information is data about your use of the service, such as IP (Internet Protocol) address, browser type, referring/exit pages, operating system, date/time stamps, and related data, which is stored in log files.

Cookies. A cookie is a small data file transferred to your computer (or other device) when it is used to access our service. Cookies may be used for many purposes, including to enable certain features of our service and remember your preferences, your equipment, browsing actions and patterns, to better understand how you interact with our service, to provide you advertising on and off the service, and to monitor usage by visitors and online traffic routing. You may be able to instruct your browser, by changing its options, to stop accepting cookies or to prompt you before accepting a cookie from the online services you visit. If you do not accept cookies, you may not be able to use all portions of our service or all functionality of our service. Please refer next section for further details about the type of cookies used and their purpose.

Third parties or publicly available sources

We may receive aggregated personal data about you from various third parties as set out below:

Technical Data from the following parties:

- a. Analytics providers such as but not limited to Google, Facebook, LinkedIn.
- b. Social media platforms such as but not limited to Facebook, Twitter, Instagram, YouTube and LinkedIn.
- c. Advertising networks and search information providers.

What personal data does WSFX collect and why?

The personal data that we may collect about you broadly falls into the following categories:

Category of Data	Purpose of Processing
Name and contact details such as address, Mobile/telephone number and email	For processing WSFX products and services and to provide those products and services to you and to communicate with you in connection with those products and services.
Personal data you may provide in communications	For corresponding with you in connection with an enquiry, providing service or complaint.
Age	For the purpose of verifying, we are legally permitted to provide you with IT products and services.
Data such as copies of passports, driving licenses, or other government-issued IDs, passport numbers, signatures, tax identification number, National Identification Number/Civil Id	For identifying and to prevent fraud in connection with accounts and to comply with anti-money laundering and fraud management requirements.
Criminal records and proceedings check, immigration status checks and World Checking searches	For complying with anti-money laundering, fraud management and other account opening and maintenance requirements.
Data to check creditworthiness such as financial history, income and outgoings, credit history.	For the purpose assessing creditworthiness for credit facilities applied or for which you propose to stand guarantor, for internal analysis, risk management, reporting, detection, and prevention of fraud.

Closed-circuit Television (CCTV) footage	If you visit our premises or any of sites, we may record CCTV footage for security purposes.
Net worth assessments	To assess whether you are a high net worth individual as defined in applicable regulations, so that we can, if you wish, obtain from you a declaration to that effect, which will exempt us from having to comply with certain regulatory steps when offering certain products.
Data about claims and proceedings (or potential claims and proceedings) by or against you	To identify, exercise and defend contractual and other legal rights.

We also use and share Aggregated Data such as statistical or demographic data for any purpose. Aggregated Data may be derived from your personal data. We treat the combined data as personal data which will be used in accordance with WSFX's Data Privacy Policy.

We use a limited number of cookies for several reasons as listed in this notice. Some cookies are required for technical reasons for our websites to operate or for administrative purposes and to enhance your online experience by keeping track of your behavior within the site.

We classify our cookies as:

a. Strictly Necessary

These cookies are essential, as they ensure your security and privacy when you use our secure sites, as well as enabling you to move around a website and use its features securely. You cannot disable these cookies.

b. Performance

In most cases, the information these cookies collect is anonymous and is only used to improve how a website works and to help us to identify issues you may have when using our online services. These cookies enable us to identify specific issues you may have/had. You can disable these cookies.

c. Persistent/Preference

Persistent cookies work by tracking your online preferences. But if you personalize the site to fit your preferences, persistent cookies will remember and implement those preferences the next time you visit the site such as store your login information, language selections, menu preferences, internal bookmarks. You can disable these cookies.

d. Targeting/Advertising

These cookies are important for WSFX to know when and how often you visit to website site, and which parts of it you have used (including which pages you have visited, and which links you have visited). As this helps us to understand, in turn, to make our website and advertising more relevant to your interests. Some information gathered by targeting Cookies may also be shared with third parties. You can disable these cookies.

Type of Cookie	Cookie Name	Purpose
Strictly Necessary	frontend	These cookies are used to provide the web store and allow customers to place orders. This cookie is used to handle user sessions during their visits

Performance	_ga	These details are used to identify the browser instances i.e. Client ID, Cookie name, domain, location
Persistent	_gat_gtag_UA_70716239_1	These cookies are used to "remember" the user's previous interactions with the web pages
Targeting and Advertising	_gcl_au	These cookies are used to Distinguish unique users and throttle the request rate

You can update your cookie preferences anytime [here](#). By default, we use only cookies necessary for our website functioning.

If we ask you to provide any other personal data not described above, then the personal data we will ask you to provide, and the reasons why we ask you to provide the personal data, will be made clear to you at the point we collect your personal data. However, we may also use your personal data for other purposes that are not incompatible with the purposes we have disclosed to you (such as archiving purposes in the public interest, scientific, historical research purposes, regulatory purposes or statistical purposes) if and where this is permitted by applicable laws.

Change of Purpose

We will only use your personal data for the purposes for which it was collected, 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 using the contact details provided.

If WSFX wish to use your personal data for a new purpose, not covered by this Notice, then we will provide you with a new notice explaining this new use prior to commencing the processing and setting out the relevant purposes and processing conditions. Where and whenever necessary, we will seek your prior explicit consent to the new processing.

Lawful basis for processing personal data

The following section describe the various purposes for which WSFX collect and process your Personal Data, and the different types of Personal Data that are collected for each purpose. Please note that not all the purposes listed below will be relevant to every individual.

WSFX's legal basis for collecting and processing the personal data will depend on the personal data concerned and the specific context in which we collect and process personal data.

However, we collect personal data from you only where we have your consent to do so, where we need the personal data to perform a contract with you, or where the processing is in the legitimate interests and not overridden by your data protection interests or fundamental rights and freedoms. In certain cases, we may also have a legal obligation to collect personal data from you or from third parties. These purposes include, but not limited to:

- a. the prevention, detection, investigation and prosecution of crime in any jurisdiction (including, without limitation, money laundering, terrorism, fraud and other financial crime).

- b. identity verification, government sanctions screening and due diligence checks.
- c. to comply with local or foreign law, regulations, directives, judgments or court orders, government sanctions, reporting requirements under financial transactions legislation, and demands of any authority, regulator, enforcement agency, or exchange body.

We may otherwise need the personal data to protect your vital interests or those of another data subject.

Who does WSFX share my personal data with?

Any personal information that we seek from you would only be aimed at providing superior service and would always be kept confidential. Keeping customer information secure and using it only as our customers would want us to, is a top priority for all of us at WSFX. We may however be required to disclose your personal information to Government, Judicial bodies and/ or our regulators to whom the organization (WSFX) is under an obligation to make disclosures under the requirements of any applicable law binding on the WSFX or any of its sites, when the situation so demands.

Here then, is our promise to each of our individual Customers:

- Access to customer information is permitted on to those employees who have a valid business reason for knowing such information. We will not reveal customer information to any external organization or third parties unless we have previously informed the Customer in disclosures or agreements, and have been expressly authorized by the Customer, or are required by applicable law.
- We will always maintain control over the confidentiality of our customer information. Customer information shall not be shared with any external organization unless the same is necessary to enable WSFX to provide you services or to support compiling your transactions and credit reports (if any). Also, this may be required as per industry's norms and terms and conditions applicable to such information as agreed to with organization. These external organizations are not permitted to access, use, or retain any customer information unless the customer has explicitly expressed interest in their products or services.
- Whenever we hire other organizations to provide support services, we will procure their conformity to our privacy standards and Non-Disclosure Agreement (NDA). Constant and regular audits will be conducted to ensure their compliance.
- We will continuously assess ourselves to ensure that Customer privacy is at all times maintained and respected. Whenever we hire third parties to provide support services, we will require them to observe our privacy standards and to allow us to audit them for compliance.

We may disclose your personal data to the following categories of recipients:

- a. to our **vendors/third parties** who provide data processing services to us, or who otherwise process personal data for purposes that are described in this Privacy Notice. If you wish to know more about our vendors/third parties, please feel free to contact us.
- b. to any **law enforcement body, regulatory, government agency, court, our affiliates/branches or other third party** where we believe disclosure is necessary
 - (1) as a matter of applicable laws or regulations.
 - (2) to exercise, establish or defend our legal rights or obligations.
 - (3) to protect your vital interests or those of any other person.
 - (4) as per legitimate interest.

- (5) processing is required for performance of task carried out in public interest and
- (6) processing is required for performance of contract.

c. to any **other person with your consent**.

We require all vendors/third parties to respect the security of your personal data and to treat it in accordance with the WSFX Data Privacy policy and applicable laws. We do not allow vendors/third parties to use your personal data for their own purposes and only permit them to process your personal data for the specified purposes and in accordance with our instructions/ guidelines mentioned in the contracts.

Transfers of Personal Data

Your personal data may be transferred to, and processed in, countries other than the country in which you reside, or your data was collected. These countries may have data protection laws that are different to the laws of your country (and, in some cases, may not be as protective).

However, we have taken appropriate safeguards to require that your personal data will remain protected in accordance with this Privacy Notice. These include implementing the Standard Contractual Clauses for transfers of personal data to our vendors/third parties and Joint Controllers processing personal data, which require all the vendors/third parties and Joint Controllers to protect personal data they process in accordance with European Union General Data Protection Regulation (EU GDPR) and DIFC Data Protection Law (Law No. 5 of 2020), as applicable.

We will conduct our business in accordance with our Privacy Policy in as many jurisdictions in which we conduct our business and operate.

For our Private and Corporate customers, WSFX "Unit 622, 6th Floor, The Summit Business Bay – Omkar, M.V. Road, Opp. PVR Cinema, Chakala Andheri (East), Mumbai - 400093" has executed specific joint controller agreement

How does WSFX keep my personal data secure?

While information is the cornerstone of our ability to provide superior service, our most important asset is our customers' trust. Keeping customer information secure, and using it only as our customers, is a top priority for all of us at WSFX.

Further, WSFX puts the security and confidentiality of your personal information at the top of its priorities as it strives to keep your personal and account information safe and secure. Refer our online security policy from more details.

We have put in place procedures to deal with any suspected personal data breach. We use appropriate technical and organisational measures to protect the personal data that we collect and process. The measures we use are designed to provide a level of security appropriate to the risk of processing your personal data. Specific measures we use include the following but not limited to:

- Information Security policies and procedures
- Physical access control systems
- Physical security presence (Security guards in the premises)
- Logical access controls (such as passwords and encryption)
- Perimeter security systems (such as firewalls, intrusion prevention systems, intrusion detection systems)

- Regular information security training for all staff (but not limited to employees - full time or part time)
- Vulnerability management

If we are required by law to inform you of any unauthorized access to your personal data we may notify you electronically, in writing, or if permitted by law, by telephone. We will also notify any applicable regulator of a data breach where we are legally required to do so.

How long does WSFX keep my personal data?

We retain personal data we process where we have legitimate interest, performance of the contract, vital interest of data subject or of another natural person, performance of a task carried out in the public interest or in the exercise of official authority vested or for the purposes of satisfying any legal, accounting, or other regulatory reporting requirements or with your consent.

When any of the above requirement cease to exist, we will either delete or anonymize or, if this is not possible (for example, because your personal data has been stored in backup archives), then we will securely store your personal data and prevent it from any further processing until deletion is possible.

Automated Decision Making

Automated decisions are decisions concerning you which are made automatically based on a computer determination (using software algorithms), without human intervention. We do not use automated decision-making.

Your data protection rights

You have the following data protection rights:

- a. The right to request access to your personal data which WSFX holds about you.
- b. The right to request WSFX to rectify any personal data if it is found to be inaccurate or out of date.
- c. The right to request your personal data is erased, where it is no longer necessary for WSFX to retain such data.
- d. The right, where there is a dispute in relation to the accuracy or processing of your personal data, to request a restriction is placed on further processing.
- e. The right to withdraw your consent to the processing at any time, wherever our right to process personal data is contingent upon your consent. However, this would not be applicable to the data processing which has already happened.
- f. The right to request that WSFX provide the data subject with the personal data and where possible, to transmit that data directly to another data controller, upon request to do so.
- g. The right to object to the processing of personal data, except where WSFX processes your personal data on legal basis.
- h. The right to lodge a complaint with a Supervisory Authority/Commissioner.

If you wish to exercise any of the rights set out above, please contact us at infosec@wsfx.in

Updates to this Privacy Notice

We may update this Privacy Notice from time to time in response to emerging legal, technical, contractual, regulatory, or business developments. When we update our Privacy Notice, we will take appropriate measures to inform you, consistent with the significance of the changes we make. We will obtain your consent to any material Privacy Notice changes if and where this is required by applicable laws. You can see when this Privacy Notice was last updated by checking the “last updated” date displayed at the top of this Privacy Notice.