

## Privacy policy

This Privacy Policy was last updated on 26 September 2024.

FixaTrader manages the information that we collect from you in accordance with applicable privacy legislation. In this Privacy Policy, "FixaTrader", "we", "our" and/or "us" means:

- (i) where you reside in any country in the European Economic Area or the United Kingdom, FixaTrader Limited.

Company details for each of the FixaTrader companies is set out in the Contact Us section below.

This Privacy Policy describes how FixaTrader collects, uses, shares and handles your personal data, and sets out the rights and obligations that both you and FixaTrader have in relation to your personal data. Country specific terms in Appendix A shall also apply to this Privacy Policy.

By accessing [www.fixatrader.com](http://www.fixatrader.com) or our mobile application (together, the "Services") you accept and agree to the Terms and Conditions of FixaTrader's user agreement ("User Agreement"), and acknowledge that your personal data may be collected, used and disclosed in accordance with this Privacy Policy. Except for any terms that are defined in this Privacy Policy then all other defined terms shall have the same meaning as that defined in the User Agreement. Note that under FixaTrader's Terms and Conditions, you must not use the Services if you are under 18 years old.

FixaTrader may, from time to time, modify this Privacy Policy (and update the web page on which it is displayed). If we materially change the ways in which FixaTrader uses or shares your personal data previously collected from you through the Services, FixaTrader will notify you through your FixaTrader account, your registered email address or other communication. You should check that account regularly.

### 1. Collection of Your Personal Data

#### Information we collect directly from you

FixaTrader collects personal data when you pre-register with FixaTrader. This includes your full name, email address and location. In circumstances where the below information is not provided to us, we may be unable to provide the Services to you and carry out our contractual obligations with you.

FixaTrader collects personal data when you register with FixaTrader. This includes:

- your name, address, email address, phone number and other contact details;
- your birth date and gender;

- your credit card and account details, which are processed by a third-party service provider that handles payments for us;
- your location and the location where you are interested in performing tasks; and
- your occupation, work experience, resume, qualifications, education, past tasks, earn money preferences, skillset, interests and other information relevant for your fitness for tasks.

If you register in certain countries, we also give you the option of providing a photo or video to be associated with your FixaTrader user ID. If your personal details change, it is your responsibility to update your FixaTrader account with those changes, so that we can keep our records complete, accurate and up to date.

To enable us to improve our existing services, to create new service features, and to serve you and others with targeted marketing communications, FixaTrader collects information about the way you use the Services, including the transactions you enter into on the Services, your feedback rating (including any references requested using our 'Reference' feature), the bids you make, the comments you post, and the transactions you enter into with our valued affiliate service providers.

### **Information we collect automatically when you use the Services**

FixaTrader may also receive and record the following information from your internet browser and computer, including through cookies and similar technologies, when you use the Services:

- computer and connection information such as statistics on page views, traffic to and from the Services, referral URL, IP address, unique device ID, browsing history and web log information; and
- information about your use of the Services, including the date and time you visit the Services, the areas or pages that you visit, the amount of time you spend viewing or using the Services, the number of times you return to the Services, other clickstream or website usage information, and emails that you open, forward or click-through to the Services.

If you use a location-enabled FixaTrader service, if you allow us, we receive and process information about your precise location (for example, through GPS signals sent by your mobile device). We may also collect the precise location of your device when the app is running in the foreground or background or when the app is closed. We may also use a range of different technologies to confirm your location. When you use the Services, we also infer the general location of your device and the geographic regions our users come from. For example, your IP address may indicate your general geographic region.

For more information on how we use cookies and other similar tracking technologies, please see the section on Cookies and Similar Technologies below.

### **Information we obtain from other sources**

In addition to data collected from your submissions, we also receive data from certain third parties, such as social media sites that you connect to your account (including Facebook, LinkedIn, Twitter and any other site you which you enable from time to time) as well as from identity verification service providers.

We may also receive additional information about you from third parties such as data or marketing partners and combine it with other information we have about you.

### **What other information users can see about you**

You are not anonymous to us when you log into the Services or post any content (including tasks, items to be supplied, bids, comments or feedback) on the Services or any associated forum.

When you:

- use the Services to post a task or item to be supplied, or make a bid, or comment on a bid, or provide feedback on other users; or
- otherwise communicate in a public forum on the Services,

your user ID and all the material that you post is visible and searchable to us, other FixaTrader users and is also publicly available to other internet users. We strongly encourage you to use caution and discretion when posting and carefully consider whether and what to post or how you identify yourself on the Services.

FixaTrader does not in any way control and does not accept any responsibility or liability whatsoever for, the disclosure or use of personal data which is voluntarily posted by you in a publicly accessible area of the Services.

## **2. How We Use Your Personal Data**

FixaTrader may use the information we collect for the following purposes:

### **Identification and authentication**

Legal ground(s) for use: We need to perform this function in order to allow you to access the Services.

### **To protect FixaTrader and the users of the Services**

Legal ground(s) for use: It is in our (and users) legitimate interests to ensure that the Services are secure.

**To customise the content and any advertising displayed on the Services and permit content on the Services (such as postings, marketing or third party advertisements) to be targeted, on an aggregate basis, to the users for whom it is most likely to be relevant**

Legal ground(s) for use: It is in our legitimate interest to provide you with content and advertisements that are tailored to your interests.

**To improve the Services and develop new service features**

Legal ground(s) for use: We need some of your personal data to provide the services to you; it is in our legitimate interests to provide you the best possible services.

**To provide, maintain and protect the Services and to verify the identity of authorised users of the Services**

Legal ground(s) for use: We need to perform this function to provide a safe and secure environment for our users and we have legitimate interests in protecting the integrity of the Services we offer.

**Providing your information to a user with whom you have or had a contract facilitated by FixaTrader**

Legal ground(s) for use: We need to use your personal data in this way to provide the Services you request.

**As required by law, order of a court, tribunal or regulator or if FixaTrader reasonably believes that the use or disclosure of the information is reasonably necessary for enforcement related activities**

Legal ground(s) for use: On such occasions, we are required by law to process your personal data.

**To ensure that FixaTrader receives payment of the fees due to it**

Legal ground(s) for use: We need to use your personal data in this way to fulfil a contract between you and us.

**To contact you to inform you about promotions or upcoming changes or improvements to the Services**

Legal ground(s) for use: We only contact you for marketing purposes with your consent; we may contact you regarding changes in the Services because it is in our legitimate interests to keep you informed about service changes that may affect you. See section below for further detail about marketing.

**To contact you to administer our User Agreement**

Legal ground(s) for use: For example, we may notify you of a breach, or action a request for a takedown notice in response to a claim of copyright infringement.

**To conduct research**

Legal ground(s) for use: It is in our legitimate interests to improve the Services through user questionnaires and feedback requests via the Services.

**To expand our user base, including marketing communications to be targeted to potential users**

Legal ground(s) for use: It is in our legitimate interest to inform potential users about the Services we offer.

**To develop our relationships with affiliate service providers and provide or arrange internal or external verification services obtained by you via the Services**

Legal ground(s) for use: It is in our legitimate interests to engage service providers and verification services.

**To generate data reports on an aggregated, non-personally identifiable basis, for both internal and third-party use, but subject to any applicable laws (for example, we may show advertisers or investors trends relating to the general use of the Services); and**

Legal ground(s) for use: It is in our legitimate interests (and the interests of our partners and affiliates) to understand how you and other users engage with the Services.

**Your contact information may also be used for accounting, invoicing and billing purposes, marketing purposes, by third party service providers to FixaTrader, and to respond to any enquiry you make**

Legal ground(s) for use: It is in our legitimate interests to engage service providers to assist us in delivering the Services you request.

**When you contact FixaTrader, we may keep a record of the communication(s) between you and FixaTrader to help resolve any issues you might have**

Legal ground(s) for use: We retain information when we are required to do so by law and because it is in our legitimate interests to protect our legal rights.

**If other user(s) of the Services already have your userID (or other information identifying you), and you have chosen to upload a photo or other personal data to your FixaTrader account, we may show those user(s) that personal data**

Legal ground(s) for use: We display your photo to other users who have your userID only with your consent, which you supply by uploading your photo.

The Services allow you to review your experience dealing with others on the Services, who may in turn leave reviews about you. We compile these reviews to provide an aggregate rating for each user, which will publicly appear along with your profile. Please be aware that other users may rely on this rating when deciding whether to engage with you.

### **Profiling and data analytics**

We (or our service providers on our behalf) may collate information about you and your preferences, to identify market segments and use that information for data analytics and direct marketing.

We (or our service providers on our behalf) may use your name, street address, email address, phone number, and data collected from cookies and similar technologies about how you use the Services (including tasks created and certain actions taken on the site) to conduct data analytics, including the creation of look-alike audiences. We use the results of data analytics for marketing, product and service development, and policy development.

We do not use sensitive information for data analytics.

### **3. Cookies and Similar Technologies**

FixaTrader uses cookies and similar tracking technologies for several purposes including to access your information when you sign in, keep track of your preferences, direct specific content to you, report on FixaTrader's user base, and to improve FixaTrader's services. We also use cookies or anonymous identifiers when you interact with our affiliate service providers (for example, when you integrate your FixaTrader account with your Facebook profile) and as further described below.

We use the following types of cookies and similar technologies:

#### **Strictly Necessary Cookies**

We use cookies and similar technologies that are necessary to the operation of the Services. This includes technologies that allow you access to our website, services, mobile app or that are required to identify irregular site behaviour, prevent fraudulent activity and improve security, or that allow you to make use of our functions such as saved search or similar functions.

If you change the settings on your internet browser to block or restrict cookies (including cookies associated with the Services), or to indicate when a cookie is being set by FixaTrader, the Services may not work as intended. You should remember that, while you may still be able to use the Services if your cookies are disabled, the Services may not function properly on your device, and you may not be able to take advantage of certain FixaTrader features.

#### **Functionality Cookies**

We use cookies and similar technologies that allow us to offer you enhanced functionality when accessing or using the Services. This may include identifying you when you sign into our website, keeping you signed in as you browse or keeping track of your specified preferences, interests, or past items viewed so that we may enhance the presentation of content on our website and mobile app.

### **Performance Analytics Cookies**

We use cookies and similar technologies to assess the performance of the Services. We use this information to analyse and help us understand how you and other visitors use the Services so we can improve the content or layout of the Services. We also use this information to track the number of our visitors and analyse the popularity of the features we offer.

### **Advertising Cookies**

We may use first-party or third-party cookies and similar technologies to deliver content, including ads relevant to your interests. This includes using technologies to understand the usefulness to you of the advertisements and content that has been delivered to you, such as whether you have clicked on an advertisement.

You may reject first-party advertising cookies and similar technologies through your browser settings (as described below). To learn more about the use of cookies or other technologies to deliver more relevant advertising and to control or opt out of the collection and use of the data by these third-party tools.

### **Browser and System Controls**

You may set your browser or operating system to limit certain tracking or to decline cookies, but you may not be able to use certain features on the Services which require such cookies. Each browser and operating system are a little different, so please check your browser or operating system's settings or help section to learn more about how to delete or disable cookies and tracking.

## **4. How We Share Your Personal Data**

FixaTrader may disclose the information we collect from you as follows:

- **FixaTrader Affiliates.** We may share your personal data with our affiliated companies.
- **Service Providers.** We share your personal data with third party service providers that provide business, verification, professional or technical support functions for us, help us operate our business and the Services, or administer activities on our behalf.
- **Analytics Partners.** We use analytics services such as Google Analytics to collect and process certain analytics data. These services may also collect information about your use of other websites, apps, and online resources. You can learn about Google's

practices by going to <https://www.google.com/policies/privacy/partners/>, and opt-out of them by downloading the Google Analytics opt-out browser add-on, available at <https://tools.google.com/dlpage/gaoptout>.

- Advertising Partners. We work with third party advertising partners to show you ads that we think may interest you. Some of our advertising partners are members of the Network Advertising Initiative (<https://optout.networkadvertising.org>) or the Digital Advertising Alliance (<https://optout.aboutads.info>). If you do not wish to receive personalized ads, please visit their opt-out pages to learn about how you may opt out of receiving web-based personalized ads from member companies. You can access any settings offered by your mobile operating system to limit ad tracking, or you can install the AppChoices mobile app to learn more about how you may opt out of personalized ads in mobile apps.
- Other Third Parties. We may share your personal data with other third parties who participate in FixaTrader marketing initiatives, as authorised by you or on an aggregate basis, and with consultants, advisors and analytics providers as necessary to measure and improve the Services we provide to you. We do not rent, sell, or share information about you with non-affiliated third parties for their direct marketing purposes, unless we have your permission.
- Sharing Between Users. We may share information, such as ratings and reviews about you, with other users who are looking for taskers on the Services. We may share this information with a user in situations where a user is independently wanting to undertake legal proceedings or action against you and has requested information about you from us. We may also share your personal data with other users where we are required or authorised by or under applicable law or a court/tribunal order or where such disclosure is necessary for compliance with a legal obligation to which we are subject.
- Legal Matters & Safety. We may share your personal data with third parties to respond to judicial process or provide information to law enforcement or regulatory agencies or in connection with an investigation on matters related to public safety, as permitted or required by law. We may also share your personal data with third parties if we believe there has been a violation of our Terms and Conditions, our rights, or the rights of any third party, or we are otherwise permitted or required to do so by law.
- With Your Permission. We may share your personal data with any other third party with your consent or as necessary to deliver a service you requested.

## 5. Security



Your account is protected by a password for your privacy and security. We take reasonable steps to protect your personal data from unauthorized access, use and disclosure, however we cannot guarantee the absolute security of that information, or that our systems will be completely free from third party interception or are incorruptible from viruses. We cannot and do not guarantee that information you send from your computer to us over the Internet will be protected by any form of encryption (encoding software). Considering this, we cannot and do not ensure or warrant the security or privacy of your personal data, including payment and account details. You transmit your personal data to us at your own risk. You are entirely responsible for maintaining the security of your passwords and/or account information.

## **6. Third Parties**

The Services may contain links to third party websites including the networks of our valued affiliate service providers, advertisers, and PayPal, or make available services obtained from third parties, including verification services by third party verification providers. If you follow a link to any of these websites, for instance Stripe payment system, or use any services obtained from third party service providers via the Services that requires you to provide personal data directly to such third parties (for instance third party verification providers), note that they have their own privacy policies. If you use the Services to link to another site, or use a service obtained from a third-party service provider via the Services, you will be subject to that site's or third party's terms and conditions of use, privacy policy and security statement. We strongly encourage you to view these before disclosing any of your personal data on such sites. FixaTrader does not control, and does not accept any responsibility or liability for, the privacy policy of, and use of personal data by, any party other than FixaTrader, including any user of the Services, the operators of any website to which the Services link, or third-party service providers to whom you directly provide your personal data (including sensitive information if relevant) to.

## **7. Marketing**

When you register on the Services you may be given the opportunity to elect ("opt-in") or decline ("opt-out") to receive updates on our latest services, news and special offers, and those of our valued affiliate service providers ("Marketing Material"), via your FixaTrader account, personal e-mail address, post or telephone. If you conclude a transaction on the Services, you may also be given the opportunity to opt- in to receive Marketing Material from FixaTrader and our valued affiliate service providers.

Once you opt-in to receive Marketing Material, you may, at any time, opt-out of receiving Marketing Material. To opt-out go to the 'Manage Account' link on the Services, choose 'Settings', then 'Notification Settings' and update your preferences. You can also click on the "unsubscribe" link in any email containing Marketing Material that we send you, or you can request an opt-out by emailing FixaTrader using the contact information provided on the

Services. If you no longer consent to receiving Marketing Material, then you must opt-out in one of these ways.

FixaTrader may contact you as the result of a referral by another user of the Services who has provided us with contact information, such as your name and email address. The use of contact information received in connection with a referral will be governed by this Privacy Policy. You may, at any time, opt-out of FixaTrader's referral system by emailing FixaTrader using the contact information provided on the Services.

FixaTrader reserves the right to send you administrative and account-related messages even if you opt out of receiving Marketing Material.

## **9. Your Rights and Choices**

**Rights in Certain Countries.** In the United Kingdom, users may have the right to access, edit, update, restrict processing and/or delete the personal data that we hold about you.

To receive a copy of the personal data that we hold about you, in a portable format, please complete the data access request form on our website.

If you would like us to delete the personal data that we hold about you (which includes permanently deleting your account), please contact us.

Where we process your personal data with your consent, you may withdraw it at any time. You may also have a right to object to processing based on legitimate interests. These rights may be limited in some circumstances, for example, if:

- we are legally permitted or required to deny you access to, and/ or to retain, the information because we are subject to a legal requirement or have a compelling legitimate interest; or
- you make a request that is unreasonably repetitive, requires FixaTrader to make a disproportionate effort, risks the privacy of others, or there are other valid reasons why we cannot comply.

We need to prevent information in our systems from being accidentally or maliciously destroyed. This means that, where you delete information from the Services, residual copies of that information on our active servers, as well as any corresponding information on our back-up systems, may not be immediately deleted.

If you have concerns about how we handle your personal data or require further information, please email FixaTrader using the contact form provided on the Services or using the contact details provided below. If you have unresolved complaints, you have the right to complain to a regulator / local data protection authority in your jurisdiction. Please see the country specific terms in Annexure A to this Privacy Policy for additional relevant details.

Location Information. You can prevent your device from sharing precise location information at any time through your device's operating system settings.

## **10. Retention**

We retain your personal data for as long as is necessary regarding the purposes for which it was collected or lawfully further processed, or for as long as may be necessary considering our legal obligations or to allow us to pursue, defend or exercise legal claims.

When deciding what the correct time is to retain your personal data, we take account of:

- legal and regulatory requirements and guidance;
- limitation periods that apply in respect of taking legal action;
- our ability to defend ourselves against legal claims and complaints;
- good practice; and
- the operational requirements of our business.

When we no longer require your personal data (and in accordance with applicable laws), we will take steps to delete, destroy or anonymise that information.

## **11. Children's Privacy**

We do not knowingly collect, maintain, or use personal data from children under 18 years of age, and no part of the Services are directed to children. If you learn that a child has provided us with personal data in violation of this Privacy Policy, please alert us using our contact information below.

## **12. Contact us**

If you have any questions about this Privacy Policy or the way we process your personal data, please contact us.

## **APPENDIX A:**

### **COUNTRY SPECIFIC TERMS**

#### **1. United Kingdom Privacy Terms**

If you are a user who has your FixaTrader Platform account in (or the Services are performed in):

- the United Kingdom ("UK") then this Privacy Policy does not limit to exclude any rights that you have or may have under the UK Data Protection Act 2018 and the "UK GDPR", which incorporates the General Data Protection Regulation (EU) 2016/679 in the UK by virtue of section 3 of the UK European Union (Withdrawal) Act 2018; or

- the European Economic Area (“EEA”) then this Privacy Policy does not limit or exclude any rights that you have or may have under the General Data Protection Regulation (EU) 2016/679 (“EU GDPR”).

For clarity, our obligations under the UK GDPR and the EU GDPR only apply where and to the extent the UK GDPR or the EU GDPR applies (as applicable). FixaTrader Limited is the data controller for the purposes of the UK GDPR and the EU GDPR (as applicable).

If the UK GDPR or the EU GDPR applies to you, we may process your personal data using the following legal bases:

- performance of a contract: where we need to perform a contract which we are about to enter into or have entered into with you as a party or to take steps at your request before entering into such contract;
- legal obligation: the processing is necessary for us to comply with our legal obligations;
- legitimate interests: the processing is necessary for our (or a third party’s) legitimate interests; or
- consent: you have given your express consent that we may process your information for these specific reasons.

If the UK GDPR or the EU GDPR applies to you and we process sensitive or special category personal data we will also ensure we are permitted to do so under applicable privacy laws. We rely on the following conditions to do so:

- we have your explicit consent;
- the processing is necessary for us to comply with our obligations as an employer;
- the processing is necessary for reasons of substantial public interests;
- the processing is necessary to protect your (or someone else’s) vital interests where you are physically or legally incapable of giving consent; or
- the processing is necessary to establish, exercise or defend legal claims.

We use automated decision making and profiling in limited circumstances. However, such automated decision making or profiling will never be used in circumstances where it may have a legal or similarly significant impact on you.

Whenever we transfer personal data outside of the EEA or the UK, we ensure at least one of the following safeguards is implemented:

- we will only transfer your personal information to countries that have been deemed to provide an adequate level of protection for personal information by the EU Commission or the UK Government (as applicable); or

- we may enter into standard contractual clauses (or equivalent measures) with the third parties located outside of the EEA or the UK (as applicable).

If the UK GDPR or the EU GDPR applies to you and you are not satisfied with our response to your complaint, or you believe that we have breached applicable laws and regulations with regards to the handling of your personal data, you may be able to file a complaint with the regulator / local data protection authority in your jurisdiction. If you are in the UK, the UK GDPR gives you the right to lodge a complaint with the Information Commissioner's Office who may be contacted as <https://ico.org.uk/concerns/>.

If the UK GDPR applies to you, you have the following rights in relation to your personal data (where applicable):

- **Access:** you have the right to request a copy of any personal information we hold about you, in a structured, commonly used and machine-readable format. If you would like to request a copy of the personal data that we hold about you, in a portable format, please complete the data access request form located [here](#)
- **Rectification:** you have the right to the rectification of your personal information, if you consider that it is incomplete or inaccurate.
- **Deletion:** you have the right to request that we delete certain personal information that we process about you, except we are not obliged to do so if we need to retain such personal information in order to comply with a legal obligation or to establish, exercise or defend legal claims. If you would like us to delete the personal data that we hold about you (which includes permanently deleting your account), please follow the steps set out [here](#).
- **Restriction:** you have the right to request restriction to our processing of your personal information in certain circumstances.
- **Portability:** you have the right to ask us to transfer a copy of certain personal information to you or to another service provider or third party where technically feasible.
- **Objection:** you have the right to object to your personal information being processed for a particular purpose (including direct marketing) or to request that we stop processing your information. You also have the right to object to certain decisions being taken by solely automated means which produce legal effects concerning you or similarly significantly affect you.
- **Complaint:** As noted above, if you are unhappy with our treatment of your personal information, and you have contacted us as set out below, you have the right to lodge a complaint with the local data protection authority.

When you exercise any of these rights we will respond within a reasonable period and in any event within one month (in compliance with the UK GDPR and the EU GDPR). Please note that in some circumstances we have the right to extend the period within which we respond to your rights request by up to two months.

If you have consented to our processing of your personal data, you have the right to withdraw, at any time, any consent that you have previously given to us for use of your personal information. In certain circumstances even if you withdraw your consent, we may still be able to process your personal information if required or permitted by law or for the purpose of exercising or defending our legal rights or meeting our legal and regulatory obligations.

To make a request to exercise any of these rights (where applicable) in relation to your personal data, please contact us using the relevant contact details above.