AGILITY FOREX LTD.
PRIVACY POLICY

Last updated: November 4, 2026

As a Canadian Money Services Business ("MSB"), Agility Forex collects, uses, discloses, stores, retains, safeguards and securely destroys personal information in accordance with applicable Canadian privacy, anti-money laundering, payment services, and regulatory requirements, including:

- The Personal Information Protection and Electronic Documents Act (PIPEDA);
- Quebec's Act Respecting the Protection of Personal Information in the Private Sector, as amended from time to time;
- The Proceeds of Crime (Money Laundering) and Terrorist Financing Act (PCMLTFA) and its Regulations;
- Guidance, reporting, recordkeeping, client identification and ongoing monitoring obligations administered by the Financial Transactions and Reports Analysis Centre of Canada (FINTRAC);
- The Retail Payment Activities Act (RPAA) and applicable Bank of Canada supervisory requirements;
- Revenue Québec licensing and regulatory requirements applicable to money-services businesses operating in Quebec.
- Applicable sanctions legislation, including the Special Economic Measures Act, the United Nations Act, and related regulations; and
- Other applicable federal and provincial laws, regulations, legal requirements and regulatory expectations.

Our privacy practices are designed to support our legal obligations as a regulated financial services provider while protecting the confidentiality, accuracy, integrity and availability of personal information

Privacy Governance

Agility Forex has established a privacy management program designed to protect personal information throughout its lifecycle.

The Privacy Officer is responsible for overseeing compliance with applicable privacy laws, privacy governance practices, privacy impact assessments, privacy incident management, employee privacy training, responses to access and correction requests, and interactions with privacy regulators.

The Privacy Officer may delegate operational responsibilities to qualified employees or service providers but retains overall accountability for Agility Forex's privacy management program.

Information we collect

We collect only the personal information necessary to provide our services, meet legal and regulatory obligations, manage risk, prevent fraud, and operate our business.

Sensitive Personal Information

Certain categories of personal information collected by Agility Forex are considered sensitive due to their nature and the regulatory requirements applicable to our business.

These categories may include:

- Government-issued identification documents;
- Financial account and payment information;
- Transaction histories and payment instructions;
- Beneficial ownership information;
- Politically Exposed Person (PEP) and Head of International Organization (HIO) information;

- Sanctions and watchlist screening information;
- Fraud and financial crime risk assessment information;
- Source of funds and source of wealth information;
- biometric information or facial comparison data processed by identity verification providers where required for identity verification;
- Identity verification information; and
- Information relating to regulatory investigations or suspicious activity reporting.

We apply additional administrative, physical and technical safeguards appropriate to the sensitivity of the information involved.

Identification information:

We may collect:

- Full name
- Date of birth
- Citizenship and residency information
- Government-issued identification information (passport, driver's licence, provincial ID card, permanent resident card, etc.)
- Social Security Number (for U.S. persons where required)
- Tax identification numbers where required by law

To verify identity and comply with anti-money laundering and know-your-client requirements, we may collect copies of government-issued identification documents such as passports, driver's licences, permanent resident cards, or other acceptable identification.

Contact information:

We may collect:

- Residential address
- Mailing address
- Business address (where applicable)
- Telephone number
- Email address

Financial information:

We may collect:

- Banking information
- Payment information
- Transaction history
- Beneficiary and recipient information
- Source of funds information
- Credit-related information where permitted by law

Corporate Information:

For business customers, we may collect:

- Corporate registration documents
- Business ownership information
- Directors and officers
- Ultimate beneficial ownership information
- Trust information
- Authorized signing authorities

- Corporate resolutions

Compliance Information:

To comply with Canadian anti-money laundering legislation, we may collect:

- Identity verification information
- Politically Exposed Person (PEP) information
- Head of International Organization (HIO) information
- Sanctions screening results
- Adverse media screening
- Occupation and employer
- Intended use of our services
- Information required for ongoing customer due diligence

Technical Information

When you visit our website, we may automatically collect:

- IP address
- Browser type
- Device information
- Operating system
- Website usage information
- Cookies and similar technologies

How we collect information:

We collect personal information:

- Directly from you
- Through our website
- Through our online trading platform
- During account opening
- During identity verification
- Through financial institutions involved in processing transactions
- From credit reporting agencies or identity verification providers where permitted by law
- From publicly available sources where permitted by law
- From third-party service providers that assist us in providing our services

Why we collect Personal Information:

In addition to the purposes listed above, we may collect, use and disclose personal information to:

- Meet our obligations under the PCMLTFA and related regulations;
- Conduct customer due diligence, enhanced due diligence, and ongoing monitoring;
- Identify beneficial owners and authorized persons;
- Detect, investigate and report suspicious transactions;
- Prevent money laundering, terrorist financing, sanctions evasion, fraud, bribery, corruption and other financial crimes;
- Meet reporting obligations to FINTRAC, the Bank of Canada, law enforcement agencies and other authorized governmental authorities;
- Manage operational, cybersecurity and payment-system risks in connection with our obligations under the Retail Payment Activities Act;
- Investigate operational incidents, privacy incidents and cybersecurity events; and
- Protect the security, integrity and availability of our products, services, customers, employees and systems.

Legal Basis for Processing

Where applicable, we process personal information because:

- it is necessary to perform our contract with you;
- it is required by law;
- it is necessary to comply with regulatory obligations;
- it is in our legitimate business interests; or

you have provided your consent.

Automated Processing and Risk Assessments

Agility Forex may use automated systems and technology tools to assist with:

- Identity verification;
- Anti-money laundering monitoring;
- Fraud detection;
- Sanctions screening;
- Risk scoring;
- Transaction monitoring;
- Cybersecurity monitoring; and
- Compliance reviews.

These systems may generate alerts, recommendations, risk assessments, account restrictions, or enhanced due diligence requirements. Automated processing may contribute to decisions regarding onboarding, transaction monitoring, fraud prevention, sanctions compliance, and account activity.

Where required by applicable law, individuals may request additional information regarding automated decision-making processes that materially affect them

Privacy Impact Assessments

Agility Forex may conduct privacy impact assessments or privacy risk assessments where required by law or appropriate to the nature of the activity, including:

- new products and services;
- new technologies;
- significant operational changes;
- new service providers;
- cross-border transfers of personal information; and
- activities involving sensitive personal information.

These assessments assist Agility Forex in identifying and mitigating privacy risks and implementing appropriate safeguards.

Consent

By providing personal information to Agility Forex, you consent to the collection, use, disclosure and retention of your personal information as described in this Privacy Policy, except where otherwise permitted or required by law.

You may withdraw consent in certain circumstances, subject to legal, regulatory, contractual, anti-money laundering, fraud prevention and record retention requirements.

Withdrawal of consent may limit our ability to provide products or services.

Sharing Your Information

We do not sell personal information.

We may disclose personal information where reasonably necessary to operate our business, comply with legal requirements, prevent financial crime, manage risks, or provide our services.

Recipients may include:

- Banks and financial institutions;
- Payment processors and payment service providers;
- FINTRAC;
- The Bank of Canada;
- Revenue Quebec;
- Federal, provincial or foreign regulatory authorities;
- Law enforcement agencies;
- Courts, tribunals and governmental authorities;
- Identity verification providers;
- Sanctions screening providers;
- Fraud prevention providers;
- Credit reporting agencies where permitted by law;
- Cloud infrastructure providers;
- Technology vendors and software providers;
- Cybersecurity service providers;
- Auditors, lawyers, accountants and professional advisors; and
- Other service providers supporting Agility Forex's operations.

We may also disclose personal information where required or permitted by law, including in connection with investigations, legal proceedings, regulatory examinations, suspicious transaction reporting, sanctions compliance, fraud investigations, mergers, acquisitions, financing transactions, or corporate reorganizations.

Cross-Border Transfers of Personal Information

Some service providers, affiliates, payment processors, financial institutions and technology providers used by Agility Forex may process or store personal information outside the province in which it was collected or outside Canada.

Before transferring personal information across borders where required by law, Agility Forex evaluates privacy and security risks and implements contractual, technical and organizational safeguards designed to provide an appropriate level of protection.

When personal information is stored or processed outside Canada, it may be accessible to courts, regulators, law enforcement agencies or governmental authorities within those jurisdictions in accordance with applicable laws.

Cookies

Our website uses cookies and similar technologies to:

- operate our website;
- improve website functionality;
- understand website usage;
- enhance security.

You may configure your browser to reject cookies; however, certain features of our website may not function properly.

Protecting Your Information

We maintain physical, technical and administrative safeguards appropriate to the sensitivity of the personal information we hold.

These safeguards include:

- encryption of sensitive information where appropriate;
- secure networks and firewalls;
- multi-factor authentication where applicable;
- role-based access controls;
- employee confidentiality obligations;
- ongoing cybersecurity monitoring;
- secure destruction of records;
- regular privacy and security training.

Although no method of transmission or storage is completely secure, we use reasonable measures designed to protect your information.

Retention of Personal Information

Agility Forex retains personal information only for as long as necessary for legitimate business purposes and to satisfy legal, regulatory, audit, security, operational and compliance requirements.

As a regulated Money Services Business, Agility Forex is required to retain certain records under the PCMLTFA, FINTRAC requirements, tax legislation, sanctions legislation, payment services regulations, litigation hold obligations and other applicable laws.

In some circumstances, we may be unable to delete personal information immediately following a request because we are legally required to retain records for prescribed retention periods.

When retention is no longer required, personal information is securely destroyed, deleted or irreversibly anonymized.

Your Privacy Rights

Subject to applicable law, individuals may have the right to:

- Access personal information held about them;
- Request correction of inaccurate or incomplete information;
- Withdraw consent where consent is the legal basis for processing;
- Obtain information regarding the use and disclosure of their personal information;
- Request information regarding automated decision-making processes where required by law;
- Request personal information in a structured technological format where required by law;
- Request deletion, de-indexing or cessation of dissemination of personal information in circumstances authorized by law;
- Submit complaints regarding privacy practices; and
- Exercise other privacy rights available under applicable Canadian privacy legislation.

These rights are not absolute and may be restricted where Agility Forex is required to retain information or continue processing information to satisfy legal, regulatory, anti-money laundering, fraud prevention, sanctions compliance, contractual or security obligations.

Marketing Communications

Where permitted by law, we may send information regarding our services.

You may unsubscribe from marketing communications at any time. This does not affect service-related or legally required communications.

Children's Privacy

Our products and services are intended for individuals who have reached the age of majority and businesses. We do not knowingly collect personal information from children.

Privacy Incidents and Security Breaches

Agility Forex maintains procedures for identifying, assessing, investigating, documenting, mitigating and reporting privacy and security incidents.

Where required by applicable law, Agility Forex will notify affected individuals and applicable regulators where a privacy incident creates a real risk of significant harm or otherwise meets mandatory reporting thresholds.

Records of privacy incidents will be maintained as required by applicable privacy legislation and regulatory requirements.

Following a privacy incident, Agility Forex may implement additional measures to reduce the likelihood of recurrence and improve its privacy and security controls.

Changes to this Policy

We may update this Privacy Policy from time to time to reflect changes in our business practices, technology, legal requirements or regulatory obligations.

The current version will always be posted on our website with the effective date shown above.

Privacy Complaints

Individuals who wish to submit a privacy-related complaint may contact the Privacy Officer using the information below.

Agility Forex will investigate complaints and respond within applicable legal timeframes.

If an individual is not satisfied with our response, they may contact the appropriate privacy regulator.

Contact Us

Questions, concerns or requests regarding privacy may be directed to:

Privacy Officer

Agility Forex Ltd. Suite 3100 1133 Melville Street Vancouver, British Columbia V6E 4E5

Email: privacy@agilityforex.com

If you are not satisfied with our response to a privacy concern, complaint or request, you may contact:

- Office of the Privacy Commissioner of Canada;
- Commission d'accès à l'information du Québec (for Quebec residents); or
- Any other privacy regulator having jurisdiction over the matter.