SimpleFX Academy Privacy Policy

Last updated: 23.10.2026

1. About this Policy

1.1. This Privacy Policy explains how we process personal data when you visit or use SimpleFX Academy at simplefxacademy.com (the "Academy").

1.2. The controller of your personal data in connection with the Academy is 8TECH PA LLC, company number 0004-IBC-2026, with its registered address at Central Street, Kunaisa Bldg., Nurrá-Wala-Mortí, Kuna de Wargandí Territory, Republic of Panama ("SimpleFX", "we", "us" or "our").

1.3. You can contact us about privacy matters via our Help Center (https://simplefx.com/help-center), with "Data Protection" as the subject, or by email to our Data Protection Officer at dpo@simplefx.com.

1.4. This Policy supplements the 8Tech PA LLC Privacy Protection Policy (https://simplefx.com/privacy-policy) (the "Main Policy"), which applies to all processing of your personal data by us, including in the Academy. This Policy describes only the processing that is specific to the Academy. Any matters not covered here are governed by the Main Policy.

2. Personal data we process

2.1. **Account data.** You log in to the Academy with your SimpleFX account. When you do so, we receive your account identifier and email address, and a username is created for you in the Academy on the basis of your email address. If you have completed identity verification (KYC) on your SimpleFX account, we also receive your first name, last name and country of residence as verified during that process. We do not receive your identity documents or other data provided during verification.

2.2. **Learning data.** Your quiz answers and results, the articles and courses you have started or completed, the SFX Coins awarded to you in the Academy, and the certificates you have generated.

2.3. **Technical and usage data.** Your IP address, device and browser type, language settings, pages visited, time spent on pages, and log data about errors and security events.

2.4. **Cookies and similar technologies**. Information collected through cookies, as described in section 8.

2.5. **Communications**. Messages you send us and our replies.

2.6. **Newsletter data**. If you subscribe to the Academy newsletter, we process the email address you provide and information about your subscription, such as the date of consent and whether you have

unsubscribed.

2.7. We do not ask for sensitive categories of personal data in the Academy, and we ask you not to provide them.

3. Why we process your data and on what basis

3.1. Where the law that applies to you, such as the EU General Data Protection Regulation (GDPR), requires a legal basis for processing, we rely on the bases shown below.

Purpose	Legal basis
Providing the Academy, logging you in and saving your progress	Performance of a contract (the Academy Terms of Use)
Scoring quizzes, crediting SFX Coins and generating certificates	Performance of a contract (the Academy Terms of Use)
Preventing fraud and abuse of Learning Rewards, and keeping the Academy secure	Our legitimate interests in protecting the Academy, its users and SimpleFX Group
Measuring how the Academy is used and improving its content	Your consent, where required for non-essential cookies; otherwise our legitimate interest in improving our services
Answering your questions and requests	Our legitimate interest in responding to you, or performance of a contract
Complying with legal obligations and responding to lawful requests from authorities	Compliance with a legal obligation
Establishing, exercising or defending legal claims	Our legitimate interests
Sending the Academy newsletter	Your consent, which you can withdraw at any time

3.2. **Marketing communications.** If you subscribe to the Academy newsletter, we will send you emails about new Academy content and related SimpleFX news. You can unsubscribe at any time using the link included in each email or by contacting us as described in section 1.3. If you hold a SimpleFX account, we may also inform you about the Academy as described in the Main Policy. Information on cookies used for advertising and remarketing purposes is set out in our Cookies Policy (see section 8).

3.3. **Automated scoring**. Quiz results and the award of SFX Coins and certificates are calculated automatically on the basis of your answers. This does not produce legal effects concerning you or similarly significantly affect you. If you believe your result was calculated incorrectly, contact us and we will review it.

4. Who we share your data with

4.1. We share learning data with other companies in SimpleFX Group, in particular the company that holds your SimpleFX account, so that SFX Coins can be credited to your account and your login can be verified.

4.2. Other recipients of personal data, including our main service providers, are listed in the Main Policy.

4.3. We do not sell your personal data.

5. International transfers

5.1. Information on transfers of personal data outside your country is set out in the Main Policy.

6. How long we keep your data

6.1. We keep learning data, including quiz results, SFX Coin awards and certificates, for as long as you have an Account. After your Account is deleted, this data is anonymised, except where we need to keep it to handle complaints and claims, in which case we keep it for up to 5 years from Account deletion, in line with the Main Policy.

6.2. We keep newsletter data until you unsubscribe. After that, we may keep a record of your consent and its withdrawal for as long as necessary to demonstrate that we sent the newsletter lawfully.

7. Your rights

7.1. Depending on the law that applies to you, you may have the right to:

- access your personal data and receive a copy of it;
- have inaccurate data corrected;
- have your data deleted;
- restrict or object to processing, including processing based on our legitimate interests;
- receive your data in a portable format;
- withdraw your consent at any time, without affecting processing carried out before the withdrawal.

7.2. To exercise these rights, contact us as described in section 1.3. We may need to verify your identity before responding. If you ask us to delete your learning data, we may no longer be able to show your progress or confirm your certificates.

7.3. More information about your rights, including how to lodge a complaint, is set out in the Main Policy.

8. Cookies

8.1. Information on how we use cookies is set out in our Cookies Policy (https://simplefx.com/legal-documents).

9. Links to other services

9.1. The Academy links to simplefx.com, to TiMi, the AI assistant on simplefx.com, and to third-party websites and social media. These services have their own privacy policies, and this Policy does not apply to them.

10. Children

10.1. The Academy is intended only for people aged 18 or over. We do not knowingly process personal data of anyone under 18. If we learn that we have done so, we will delete the data.

11. Changes to this Policy

11.1. We may amend this Policy, in particular where this is required by changes in applicable law, or where we change the way we process personal data in the Academy.

11.2. The current version of this Policy is always available in the Academy footer, together with the date of the last update. Where changes are significant, we will take reasonable steps to inform you.

12. Contact

12.1. If you have any questions about this Policy or how we process your personal data, contact us as described in section 1.3.