

## PRIVACY POLICY

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### 1. Introduction

First London Brokers Ltd (hereinafter referred to as “FLB”, “we”, “us” or “our”) is subject to the provisions of the General Data Protection Regulation (EU) 2016/679 (known as “GDPR”) effective from 25th May 2018.

We respect the individuals’ rights to privacy and to the protection of personal information at all times. The purpose of this Privacy Notice is to explain how we collect and use personal information in connection with our business.

This Privacy Notice applies to all personal information processing activities that we carry out. We are a data controller in respect of the personal information that we process in connection with our business. This Privacy Notice covers the processing of all personal information whether or not you become a client of FLB and includes any collection and processing of personal data that takes place before you are offered a product or service by us as well as that processed during the period that we have a business relationship with you.

### 2. What is personal Information?

Personal information means information about a living individual who can be identified from that information (either by that information itself or when it is combined with other information). Your personal information consists of information that we collect, process and hold in respect of you as an individual client or as a corporate client. Please note that if you are a corporate client, “you” or “your information” refers to the personal information of your business entity and its proprietors, officers and beneficial owners.

### 3. The Personal Information that we collect, hold and process

We collect and process personal information at the start and for the duration of our relationship with you. We will limit the collection and processing of information to that which is required for legitimate purposes in order for us to provide financial services to you. Please note that if you refuse to provide the personal information that we request, it may not be possible for us to offer, or continue to offer our products and services to you.

The personal information that we collect, process and hold includes information from the following sources:

- information that you provide to us such as;
  - basic information such as your full name, date of birth, residential address and contact details as well as electronic images of documents that verify such information (for example: your passport, utility bill, bank or credit card statement);

- information that is necessary to service your trading account such as details of the bank account that you use to fund and make withdrawals from your trading account.
  - information about your financial circumstances including income, personal wealth, the financial amount available and source of funds for your trading activities, and the purpose/s of your investments with us.
  - information about your trading knowledge and experience and trading history.
  - Details of your education and occupation/employment;
- information that we may seek or receive from third parties which may include related companies, third parties who provide services to you or us, fraud prevention or government agencies, and third party databases which enable us to verify your identity for anti-money laundering and financial crime prevention purposes;
  - Knowledge that we gain through our relationship with you and the way that you operate your trading account/s;
  - Information derived from the technology that you use to access our services such as location data from your mobile phone, phone number or IP address. Please refer to our Cookie Policy for information about our use of cookies.
  - Information that we may gather from publicly available sources such as the press, the electoral register, company, professional and regulatory registers, and on-line search engines.

#### **4. Why we collect, process and hold your personal data**

We collect, process and hold your personal information for a variety of reasons which include:

- **Contractual necessity:** We will process your information where it is necessary to enter into a contract with you for the provision of our products and services and to perform our obligations under that contract. This includes information necessary to manage and maintain our relationship with you.
- **Our legal and regulatory obligations:** When you apply for a trading account with us, we are required by law, to collect and process and hold certain personal information about you. This may include information necessary to:
  - confirm your identity and verify the accuracy of information that you have provided us with;
  - perform checks, assessments and monitor transactions and location data for the purpose of preventing and detecting crime and to comply with laws relating to money laundering, fraud, terrorist financing, bribery and corruption, international sanctions and politically exposed persons. This may involve investigating and gathering intelligence on suspected financial crimes, fraud, and threats and sharing data with law enforcement agencies and regulatory bodies;
  - monitor transactions to identify and prevent market abuse
  - assess the appropriateness/suitability of products and services for our clients where appropriate;
  - share data with police, law enforcement, tax authorities or other government and fraud prevention agencies where we have a legal obligation to do so, including reporting suspicious activities and complying with production and court orders;
  - deliver mandatory communications or updates to product and service terms and conditions to you;
  - investigate and resolve complaints;
  - conduct investigations into breaches of conduct and corporate policies by our employees and other relevant persons;

- report to and respond to our regulator including managing contentious regulatory issues, investigations and litigation;
  - perform assessments and analyse client data for the purposes of managing, improving and fixing data quality;
  - provide assurance that we have effective processes to identify, manage, monitor and report the risks that our clients and ourselves are or may be exposed to; and
  - co-ordinate and resolve matters arising from any incident, emergency or disruption of our normal course of business.
- Our legitimate interests: In the course of the day to day running of our business we process your information where it is in our legitimate interests as a business and without prejudicing your interests or fundamental rights and freedoms. Such includes the information that we need to:
- effectively manage our business and financial affairs, protect our clients, employees and property, ensure that our processes and systems operate effectively and that we can continue to operate, as a business;
  - Determine the most appropriate products and services for our clients and the terms and conditions of such;
  - ensure that we can continue to develop and improve as a business;
  - manage your and our risks appropriately;
  - prevent financial crime, cybercrime and any other illegal activity that may impact on you or us, or your or our interests. Please note that the measures that we take may exceed our statutory obligations.

## 5. Your rights under the GDPR

The General Data Protection Regulations provide you with certain rights which are explained in the following table.

Your Rights	Description
<b>Access</b> - You have a right to gain access to the personal information that we hold about you.	At your request we will provide you with a copy of the personal information that we hold about you.
<b>Rectification</b> - You have a right to the rectification of inaccurate personal information and to update incomplete personal information.	If you believe that any of the information that we hold about you is incorrect or incomplete, you have the right to request that we restrict the processing of that information and to rectify the inaccurate or incomplete personal information.
<b>Restriction</b> - You have a right to request us to restrict the processing of your personal information.	You may request that we restrict processing your information if you believe that: <ul style="list-style-type: none"> <li>➤ any of the information that we hold about you is inaccurate;</li> <li>➤ we no longer need to process your information for the purposes for which it was provided but you require the information to establish, exercise or defend legal claims; or</li> <li>➤ we are using your information in an unlawful manner.</li> </ul>
<b>Erasure</b> - You have a right to request that we delete your personal information.	You may request that we delete your personal information if you believe that: <ul style="list-style-type: none"> <li>➤ we no longer need to process your information for the purposes for which it was provided;</li> </ul>

	<ul style="list-style-type: none"> <li>➤ we have requested your permission to provide your information and you wish to withdraw your consent; or</li> <li>➤ we are using your information in an unlawful manner</li> </ul> <p>Please note that we are required by our regulators to retain personal information for specific time periods (depending on the type and nature of that information). Certain information must be retained for a period even after our business relationship with you ceases. We will promptly and securely destroy/erase your personal data that we hold at the time that these criteria are met. Please note that our legal obligation in this matter overrides any right to prompt erasure that you may hold under the GDPR.</p>
<b>Portability</b> – You have a right to data portability.	<p>Where we have requested your permission to process your personal information or you have provided us with information for the purposes of entering into a contract with us, you have a right to receive that information in a portable format.</p> <p>You may also request that we provide your information directly to a third party. Should this be the case, we will not be responsible for any such third party’s use of your information and such will be governed by their agreement with you and any privacy statement that they provide to you.</p>
<b>Objection</b> - You have the right to object to the processing of your personal information.	<p>You have a right to object to us processing your personal information (and to request that we restrict processing) for purposes other than contractual and legal reasons unless we can demonstrate compelling and legitimate grounds for the processing, which may override your own interests or where we need to process your information to investigate and protect us or others from legal claims.</p>
<b>Marketing</b> – You have a right to object to direct marketing.	<p>You have a right to object at any time to us processing your information for direct marketing purposes, including profiling you for the purposes of direct marketing. For further information about direct marketing, please see section 9 of this document.</p>
<b>Withdraw consent</b> – You have a right to withdraw consent.	<p>Where we rely on your consent to process your personal data, you may withdraw that consent at any time. We will always make it clear where we require you consent to carry out specific processing activities.</p>

Please note that, in some circumstances, we may have to suspend the operation of your account and /or the products or services that we provide to you if:

- you withdraw your consent for us to process your personal information;
- you request that we restrict the processing of your information; or
- you request that we delete your information.

If you would like more information or to exercise any of your rights under the General Data Protection Regulations as outlined in the table above, please contact us at: [info@flbrokers.com](mailto:info@flbrokers.com)

## **6. Your right to complain**

The General Data Protection Regulations also provide you with the right to lodge a complaint with the regulator who, in the UK, is the [Information Commissioner's Office](#).

If you consider that any action of ours breaches this Privacy Notice or the Data Protection Principles or otherwise does not respect your privacy: In the first instance, we would request that you contact your Relationship Manager as most issues can be resolved promptly in this way. However, if you remain unsatisfied, you can make a complaint using our Complaints Procedure.

We would welcome the opportunity to resolve matters as outlined above however, you can contact the Information Commissioner's Information and Enquiries Line directly on 01625 545 745 at any time should you so wish.

## **7. Sharing your information with third parties**

We will not share your information with anyone outside FLB except:

- where we have your permission to do so;
- where required in respect of the products and services that we provide to you;
- with related companies who provide financial services;
- with outsourcing partners, service providers and specialist advisers who have been specifically contracted to provide us with such services;
- with introducing brokers or affiliates with whom you and FLB have a mutual business relationship;
- with regulatory bodies or law enforcement agencies; and
- with identity checking and reference agencies.

## **8. Transferring information overseas**

We may transfer your personal information to organisations in other countries (including to related companies) both in the EU and outside the EU on the contractual basis that anyone to whom we pass your information protects it under applicable laws however, such laws may not have strong data protection laws when compared with those in force in the United Kingdom.

## **9. Transferring information to Affiliated Companies**

First London Brokers Ltd will procure that its Affiliated Companies who have access to personal data will maintain appropriate technical and organisational security measures against unauthorised or unlawful processing of the personal data and accidental loss or destruction of, or damage to, the personal data.

## **10. Marketing information**

Unless you have told us that you do not wish to receive marketing information from us, we will provide to you relevant marketing information (which may include details of products or services provided by related companies) which we believe may be of interest to you, by mail, phone, email, text and other forms of electronic communication. If you change your mind about how you would like us to communicate with you or you no longer wish to be provided with this information, you can tell us by contacting Client Services or emailing us at [info@flbrokers.com](mailto:info@flbrokers.com).

#### **11. Communications about your account**

We will contact you with information about the operation and maintenance of your account (including updated information about how we process your personal information) by a variety of means including via your on-line account, email, text message and telephone. If at any point in the future, you change your contact details you should advise us promptly.

Please note that we may record telephone calls and retain emails, text messages and on-line chat in accordance with applicable laws for monitoring purposes in relation to our legal and regulatory obligations, and also for training and quality control purposes.

#### **12. Changes to the way that we use your information**

From time to time we may change the way that we use your information. We will notify you and publish a revised version of this Privacy Notice on our website. Where we believe that you may not reasonably expect such a change, we will notify you and allow a period of 30 days for you to raise any objections before the change is made. However, please note that in some cases, should you not agree to such changes it may not be possible to continue our business relationship with you.

#### **13. Security and safeguards**

We will store data electronically and maintain a “paper free” environment for security and environmental reasons. We have developed and will maintain strict systems and controls in respect of electronic, physical and organisational security procedures in order to safeguard personal data against loss, theft, copying and unauthorised disclosure, use or modification. Access to personal data is restricted to relevant employees and authorised service providers who need it in order to perform their work. Our staff receive training to ensure that they understand and meet their obligations regarding our security policies.

#### **14. Language of communications**

All First London Brokers Ltd. legal documents are available in English. Translations into other languages, where provided, are for referential purposes only. For the avoidance of doubt, the English version shall prevail in the event of any inconsistencies or ambiguities.