

PRIVACY NOTICE

1. WHO WE ARE?

LCG Capital Markets Limited (FlowBroker) ('LCG BHS', 'we' or 'us' or 'our') gather and process Personal Data in accordance with this privacy notice and in compliance with the relevant data protection Regulation and laws. We adhere to the General Data Protection Regulation (GDPR), which applies to the processing of personal data in the context of the activities of an establishment in the European Union.

LCG BHS is a company registered in The Commonwealth of the Bahamas under registered number: 200271 B. The business address for LCG BHS is 5 North Buckner Square, Olde Towne Sandypport, West Bay Street, Nassau, Bahamas. LCG BHS is authorized and regulated by the Securities Commission of Bahamas (SCB) with License No. SIA-F194. We act as the data controller when processing your data. Our designated Privacy Officer is Camille Culmer who can be contacted at Camille.Culmer@lcg.com.

The payment processor is London Capital Group Limited, a company incorporated in the United Kingdom with registration number 03218125, located 75 King William St., London, EC4N 7BE, United Kingdom.

This notice provides you with the necessary information regarding your rights and our obligations, and explains how, why and when we process your Personal Data.

2. INFORMATION THAT WE COLLECT

LCG BHS processes your Personal Data to meet our legal, statutory and contractual obligations and to provide you with our products and services. We will never collect any unnecessary Personal Data from you and do not process your information in any way, other than as specified in this notice.

The Personal Data that we collect from you is:

- name, address and contact details including but not limited to phone number and email address
- date of birth and gender
- employment and occupation details
- ID and/or passport number
- national/tax identification number
- information about your income and wealth including details about your assets, trading history and performance
- any other similar information (including all relevant information for legal persons/entities)

We may obtain this information through your use of our services or other dealings with us including through any of our websites, apps, the account opening applications, demo sign up, webinar sign up, subscribing to news updates and from information provided during ongoing customer communication.

We may also collect this information about you from third parties through our 'refer clients' partner schemes.

We may ask for other Personal Data voluntarily from time to time to enable us to improve our service or consider the wider needs of our customers or potential customers.

We may record any communications, electronic, by telephone, in person or otherwise, that we have with you in relation to the services we provide to you and our relationship with you. These recordings will be our sole property and constitute evidence of the communications between us. Any telephone conversation may be recorded without the use of a warning tone or any other further notice.

If you visit any of our offices or premises, we may have CCTV, which will record your image.

If you choose not to provide the information we require to fulfil your request for a certain product or service, we may not be able to provide you with the requested product or service.

3. HOW WE USE YOUR PERSONAL DATA (LEGAL BASIS FOR PROCESSING)

LCG BHS may use Personal Data for the following purposes:

- Identity Verification, Account establishment and Management

As part of providing services, or information about our services, to you, we will need to verify your identity to accept you as a customer and we will need to use those details in order to effectively manage your account with us to ensure that you are getting the best possible service from us. This may include third parties carrying out identity checks on our behalf. It is in our legitimate interest to do so and the use of your Personal Data in this way is necessary for us to know who you are as we also have a legal obligation to comply with certain regulatory obligations.

- Provisions, Improvement and Development of Products and Services

After account opening we will need to use your Personal Data to perform our services and comply with our obligations to you. It is in our legitimate interests to ensure that we provide you with the best products and services so we may regularly review your needs to ensure that you get the best possible products and services from us.

We may from time to time use Personal Data provided by you through your use of our services and/or through customer surveys to help us improve our products and services. It is in our legitimate interests to do so.

- Settlement of Enquiries and Disputes

Where we consider there to be a risk that we may need to defend or bring legal claims, we may retain your Personal Data as necessary for our legitimate interests in ensuring that we can properly bring or defend legal claims. We may also need to share this information with our insurers or legal advisers. How long we keep this information for will depend on the nature of the claim and how long we consider there to be a risk that we will need to defend or bring a claim. It is in our legitimate interests to use your Personal Data in such way.

- Compliance with Applicable Laws and Regulations

We may need to use your Personal Data to comply with applicable law, court order or other judicial process, or the requirements of the Securities Commission of The Bahamas.

We do this not only to comply with our legal obligations, but because it may also be in our legitimate interest to do so.

- Profiling

We may from time to time use Personal Data about you to form profiles about you so that we understand your needs and provide the very best products and services we can. We may also make decisions about you through automated profiling or automated identity checks which could affect your ability to use our services. We may need to do this either to perform our legal obligations or because it is in our legitimate interest to use your Personal Data in such a way.

- Marketing and communications

We may use your Personal Data in order to send you, research, education and promotional materials which you might be interested in.

Where we send you marketing communications, we will either do so as it is in our legitimate interest or we have obtained your consent by requiring you to “opt in” to receive such communications.

You may withdraw or vary this consent at any time or by contacting LCG BHS directly or updating your preferences in the communications section of MyLCG. Marketing emails will always have an unsubscribe option to allow you to opt out of any further marketing emails.

- Website Information

Our web pages may contain web beacons or pixel tags or any other similar type of data analysis tools which allow us to track the number of users that have visited our webpage. Where your Personal Data is completely anonymised, we do not require a legal basis as the information will no longer constitute Personal Data. However, where your Personal Data is not in an anonymised form, it is in our legitimate interest to continually evaluate that Personal Data to ensure that the products and services we provide are relevant to the market. We may also Personal Data about you through your use of apps or using cookies on our websites and/or apps, by recording which pages you look at on our websites.

- Internal Business and Record Keeping

We may need to process your Personal Data for internal business and research purposes and record keeping purposes. Such processing is in our own legitimate interests and is required to comply with our legal obligations. This may include any communications that we have with you in relation to the services we provide to you and our relationship with you. We will also keep records to ensure that you comply with your obligations under any contract you have entered with us.

- Our Premises

We may collect information about visitors to our premises. We may record information on your visit, including the date and time, who you are visiting, your name, employer, contact details and vehicle registration number. It is in our legitimate interest to do so. We may operate CCTV at our premises which may record you and your activities. We display notices to make it clear what areas are subject to surveillance. We only release footage following a warrant or formal request from law enforcement, or as necessary in relation to disputes. It is not only a legal requirement, but also in our legitimate interest to do so.

- Sharing with Partners

We may share your Personal Data with partners who provide services on our behalf or have introduced you to us. It is in our legitimate interest to use your Personal Data in such way to provide you with our services.

- Sharing with Group Entities

We may share your Personal Data with other entities in our group as part of our regular reporting activities on company performance, in the context of a business re-organisation or group restructuring exercise, and for system maintenance support and hosting of data. It is in our legitimate interest to use your Personal Data in such way, provided we comply with any legal obligation we have to you.

4. YOUR RIGHTS

This section explains your rights in relation to your Personal Data in more detail. The various rights are not absolute and are subject to certain exceptions or qualifications.

You are entitled to receive Personal Data free of charge except in the following circumstances where we may charge a reasonable fee to cover our administrative costs of providing the Personal Data for:

- manifestly unfounded or excessive/repeated requests, or
- further copies of the same information.

Alternatively, we may be entitled to refuse to act on the request.

Please consider your request responsibly before submitting it. We'll respond as soon as we can.

Generally, this will be within one month from when we receive your request but, if the request is going to take longer to deal with, we'll let you know.

In order to exercise any of the rights described below please contact LCG BHS directly.

The right to be informed

LCG BHS will provide data subjects with various pieces of information about the data processing activities it carries out.

This information is usually provided in our Privacy Notice.

The right of access

LCG BHS will provide data subjects with:

- confirmation their data is being processed;
- access to their Personal Data; and
- other supplementary information.

We can only provide you with *your data*, not Personal Data about another person. Also, where access would adversely affect another person's rights, we're not required to provide this.

The right to rectification

Data subjects can have their Personal Data rectified if it is inaccurate or incomplete. Where we need to notify any third parties with whom we have shared your Personal Data information that you've made a rectification request, we will take reasonable steps to do this. If it is not possible or may involve disproportionate effort, we may not be able to do this.

The right to erasure

Data subjects have the right for their data to be erased where:

- the Personal Data is no longer necessary for the purpose it was originally collected/processed;
- you withdraw consent (where previously provided);
- you object to the processing and our legitimate interests in being able to keep processing your Personal Data don't take priority;
- we've been processing your Personal Data in breach of data protection laws; or
- the Personal Data has to be erased in order to comply with a legal obligation.

LCG BHS can refuse to erase a data subject's Personal Data where we are required to retain it:

- to comply with a legal obligation or
- for the exercise or defence of legal claims;

Where we need to notify any third parties with whom we have shared your Personal Data that you've made an erasure request, we will take reasonable steps to do this. If it is not possible or may involve disproportionate effort, we may not be able to do this.

The right to restrict processing

Data subjects have the right to restrict the processing of Personal Data where:

- they have contested its accuracy;
- they have objected to the processing and you are considering whether you have a legitimate ground which overrides this;
- processing is unlawful;
- you no longer need the data but the data subject requires it to establish, exercise or defend a legal claim

Where we need to notify any third parties with whom we have shared your Personal Data that you've made a restrict processing request, we will take reasonable steps to do this. If it is not possible or may involve disproportionate effort, we may not be able to do this or ensure they restricted the processing of the Personal Data they hold.

The right to data portability

The right to data portability only applies:

- to Personal Data you have provided to us (i.e. not any other information);
- where the processing is based on your consent or for the performance of a contract; and
- when processing is carried out by automated means.

We will provide the Personal Data in a structured, commonly used and machine-readable form.

The right to object

Data subjects have the right to object to:

- processing based on legitimate interests – you have the right to object, on grounds relating to your particular situation, at any time to processing of Personal Data concerning you which is based on legitimate interests.
- direct marketing (including profiling) - you can object at any time to your Personal Data being used for direct marketing purposes.

Rights relating to automated decision making and profiling

Data subjects have the right not to be subject to a decision when:

- it is based on automated processing; and
- it produces a legal effect or a similarly significant effect on the individual.

We will ensure data subjects are able to:

- obtain human intervention; ○ express their point of view; and ○ obtain an explanation of the decision and challenge it.

The above right does not apply if the automated decision:

- is necessary for entering into or performance of a contract between you and the individual;
- is authorised by law (e.g. for the purposes of fraud or tax evasion prevention); ○ is based on explicit consent; or ○ does not have a legal or similarly significant effect on the data subject.

5. SHARING AND DISCLOSING YOUR PERSONAL DATA

We may disclose your Personal Data to:

- Any relevant regulatory, governmental, or law enforcement authority as required by law or as agreed with you
- our insurers, agents, service providers, specialist advisers, suppliers and subcontractors who provide us with insurance, administrative, IT, financial, verification, regulatory, compliance research or other services
- professional advisors such as our legal advisors in connection with any ongoing or prospective legal proceedings or in order to establish, exercise or defend our legal rights, and our auditors and accountants in order to satisfy our regulatory and financial reporting obligations
- introducing brokers and affiliates with whom we have a mutual relationship
- any member of our group, meaning our subsidiaries, our ultimate holding company and its subsidiaries, and successors in title to our business
- anyone authorized by you.

Generally, we require that third parties who handle or obtain your Personal Data acknowledge the confidentiality of this information, undertake to respect any individual's right to privacy and comply with the Bahamas Data Protection Regulations, the General Data Protection Regulation and this privacy notice.

6. INFORMATION SECURITY

LCG BHS takes your privacy seriously and takes every reasonable measure and precaution to protect and secure your Personal Data. We train our employees who handle Personal Data to respect the confidentiality of Personal Data and the privacy of individuals.

We use commercially reasonable physical and electronic safeguards to protect your Personal Data from loss, misuse, and unauthorised access, disclosure, alteration, and destruction in accordance with applicable law. Please be aware that despite our best efforts, no data security measures can guarantee 100% security all of the time. If you have online account access, we recommend that you take steps to protect against unauthorised access to your password, phone, and computer by, among other things, signing off after using a shared computer, choosing a robust password that nobody else knows or can easily guess, and keeping your user name and password private.

7. INTERNATIONAL TRANSFERS

Although LCG BHS is based in the Bahamas, your Personal Data may be transferred to, stored at or processed in other countries, which may not have equivalent privacy or data protection laws. However, regardless of where your Personal Data is transferred, we will ensure that the transfer is subject to appropriate safeguards in accordance with data protection laws.

8. HOW LONG WE KEEP YOUR DATA

LCG BHS only ever retains Personal Data for as long as is necessary and we have strict review and retention policies in place to meet these obligations.

Certain laws and regulations which we may require us to maintain records for a significant period of time. We are a firm authorized under the Securities Commission of The Bahamas (SCB) and as such we are required by law to retain certain data in relation to opening customer accounts and the provision of financial services to customer the legal requirements include, but are not limited to:

- The Securities Industry (Anti Money laundering and Countering the Financing of Terrorism) Rules 2015
- Guidelines for Supervised Financial Institutions on the Prevention of Money Laundering & Countering the Financing of Terrorism

We will hold information about you on electronic and/or paper files whilst you are a customer and for at least seven (7) years after our business relationship with you has ended.

When we consider that Personal Data is no longer needed, we will remove any details that will identify you or we will securely destroy the records.

9. COOKIES

We use cookies to give you access to certain pages of our website(s) or our app(s) without having to log in each time you visit.

Cookies are small pieces of text stored on your computer to help us determine the type of browser and settings you are using, where you have been on the website(s) or the app(s), when you return, where you came from, and to ensure your information is secure. The purpose of this information is to provide you with a more relevant and effective experience on our website(s) or our app(s), including presenting web pages according to your needs or preferences.

10. TECHNOLOGY IMPROVEMENTS

We want to provide you with better and improved experience through constant technology development. This may result in a change to the way in which Personal Data is collected or used. The impact of any technology changes which may affect your privacy will be notified in this privacy notice at the time of change.

11. CONTACT US

If you have any questions about this privacy notice or want to exercise your rights, please contact our Privacy Officer by:

- Email at: Camille.Culmer@lcg.com
- Post to: LCG Capital Markets Limited, P.O. Box AP 59223, Slot 506, Nassau, NP Bahamas, Cable Beach Shopping Center

12. LODGING A COMPLAINT

LCG BHS only processes your Personal Data in compliance with this privacy notice and in accordance with the relevant data protection laws. If, however you wish to raise a complaint regarding the processing of your Personal Data or are unsatisfied with how we have handled your information, you have the right to lodge a complaint with the supervisory authority.

The Office of the Data Protection Commissioner
2nd Floor, Cecil Wallace Whitfield Centre
Cable Beach
P.O. Box N-3017 Nassau
New Providence
The Bahamas
Tel. (242) 702-1552 / 1534
Fax. (242) 327-7501
E-mail: dataprotection@bahamas.gov.bs

13. CHANGES TO OUR PRIVACY NOTICE

LCG BHS may change this privacy policy from time to time. When such a change is made, we will post a revised version online. Changes will be effective from the point at which they are posted. It is your responsibility to review this privacy policy periodically, so you are aware of any changes.